## The Deposition of

## KIMBERLY FLOURNOY

In the Matter of

## MAGNOLIA ISLAND PLANTATION, ET AL

versus

**LUCKY FAMILY, L.L.C, ET AL** 

Taken On

**OCTOBER 26, 2022** 



		1			2
1	UNITED STATES DIST		1	APPEARANCES:	
2	WESTERN DISTRICT (		2 3	FOR THE PLAINTIFFS, MAGNOLIA ISLAND PLANTATION,	
3 4	SHREVEPORT DI	LVISION		L.L.C.; AND BARBARA MARIE CAREY LOLLAR:	
5	MAGNOLIA ISLAND PLANTATION,	CIVIL ACTION NO.	4 5	ANDREW D. MARTIN	
	L.L.C.; and BARBARA MARIE	5:18-CV-1526		DAVIDSON SUMMERS	
6	CAREY LOLLAR	0 10 01 1011	6	330 MARSHALL STREET, SUITE 1114	
		CHIEF JUDGE MAURICE	7	SHREVEPORT, LOUISIANA 71101 dmartin@davidsonsummers.com	
7	VERSUS	HICKS, JR.	8		
8	LUCKY FAMILY, L.L.C.; W.A.	MAGISTRATE JUDGE	9	FOR DEFENDANT, W.A. LUCKY, III:	
	LUCKY, III; BOSSIER PARISH	KAYLA D. McCLUSKY	10	CURTIS R. SHELTON	
9	SHERIFF JULIAN C.		11	AYRES, SHELTON, WILLIAMS, BENSON & PAINE, LLC	
	WHITTINGTON, in his official		12	333 TEXAS STREET, SUITE 1400 SHREVEPORT, LOUISIANA 71101	
10	capacity.	JURY TRIAL DEMANDED		curtisshelton@arklatexlaw.com	
11	******	* * * * * * * * * * * * * * * * * * * *	13	EOD DEEDMOANE LUGUY EANTLY LLC.	
11 12	The deposition of KIMBERLY	FI.OURNOV taken in	14 15	FOR DEFENDANT, LUCKY FAMILY, LLC:	
13	connection with the captioned ca			ALLISON JONES	
14	following stipulations before Je		16	DOWNER, JONES, MARINO & WHITE, LLC 401 MARKET STREET, SUITE 1250	
15	Court Reporter, at Langley Parks		17	SHREVEPORT, LOUISIANA 71101	
16	Suite 100, Bossier City, Louisia			ajones@djmw-law.com	
17	26th day of October, 2022, begin	nning at 1:15 p.m.	18 19		
18				FOR DEFENDANTS, SHERIFF JULIAN C. WHITTINGTON AND	
19			20 21	KIMBERLY FLOURNOY:	
20			21	GLENN L. LANGLEY	
21			22	LANGLEY, PARKS LLC	
22			23	4444 VIKING DRIVE, SUITE 100 BOSSIER CITY, LOUISIANA 71111	
24			23	glangley@langleyparks.com	
25			24 25		
			23		
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1		<b>5</b> EXHIBIT #12 - NOTICE OF SEIZURE 69	1		KIMBERLY FLOURNOY,
2		EXHIBIT #13 - E-MAIL FROM CURTIS SHELTON TO KIM	2	of+.	er having been duly sworn was examined and did
3		FLOURNOY 9/14/2018			
		EXHIBIT #14 - E-MAIL BETWEEN CURTIS SHELTON AND	3		tify as follows:
4 5		KIM FLOURNOY ABOUT ADVERTISEMENT FORM 73 EXHIBIT #15 - AD AND INVOICE FROM BOSSIER PRESS-	4	EXA	MINATION BY MR. MARTIN:
5		TRIBUNE	5	Q	Good afternoon. I'm Drew Martin. How are you?
6			6	Α	I'm good.
7		EXHIBIT #16 - E-MAIL BETWEEN CURTIS SHELTON AND KIM FLOURNOY - 9/17/2018	7	Q	Can you state your full name for the record?
8		EXHIBIT #17 - AFFIDAVIT	8	A	It's Kimberly Dawn Flournoy.
9		EXHIBIT #18 - E-MAIL BETWEEN CURTIS SHELTON AND KIM FLOURNOY - 9/21/2018	9	0	Thank you for being with us, Ms. Flournoy. You
10		KIM FEOURNOI - 9/21/2010	10	~	feeling okay today? Feel capable of giving a
1.1		EXHIBIT #19 - E-MAIL 10/12/2018 95	11		deposition?
11		EXHIBIT #20 - E-MAIL 10/12/2018	12	7\	<del>-</del>
12				A	Yes, sir.
13		EXHIBIT #21 - E-MAIL	13	Q	Okay. Have you ever given a deposition?
13		EXHIBIT #22 - E-MAIL	14	A	No, sir.
14		EVIITET #02 E MATI 10/10/0010	15	Q	Okay. I'm going to try to make it go as
15		EXHIBIT #23 - E-MAIL 10/18/2018	16		smoothly as possible. I don't want to be here
		EXHIBIT #24 - FORM	17		anymore than you do. To do that, put down some
16		EXHIBIT #25 - APPRAISAL	18		ground rules of how to make it flow faster, go
17			19		better. If at any point you want a break, just
18		EXHIBIT #26 - E-MAIL 10/22/2018129	20		tell me I'd like to take a break.
10		EXHIBIT #27 - INVOICE FROM LACOUR 164	21	A	Okay.
19			22	0	I will let you take a break, if you need to go
20 21			23	Q	
22			-		to the bathroom or just want to catch your
23 24			24		breath. The only thing I ask is if a question
25			25		is pending, if I've asked you a question, you
			-		
			1		
		7			
1		7 haven't answered it yet, wait til the question	1		WITNESS:
1 2		•	1 2		
		haven't answered it yet, wait til the question is answered and then say I'd like to take a		0	WITNESS: Oh, okay.
2		haven't answered it yet, wait til the question is answered and then say I'd like to take a break. If you need me to repeat a question I	2	Q	WITNESS: Oh, okay. Okay. I'm going to hand you a document I'm
2 3 4		haven't answered it yet, wait til the question is answered and then say I'd like to take a break. If you need me to repeat a question I might not say a question very clearly. That	2 3 4	Q	WITNESS: Oh, okay. Okay. I'm going to hand you a document I'm marking as Exhibit #1. It's called Notice of
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q	haven't answered it yet, wait til the question is answered and then say I'd like to take a break. If you need me to repeat a question I might not say a question very clearly. That often happens. Just say can you repeat a question. If I ask a question and someone makes an objection, I'm going to ask you to answer it anyway. If someone instructs you not to answer if your lawyer instructs you not to answer I will talk with him, but otherwise I'm going to ask you just answer the question I asked. If you need me to repeat it at that point just say so. I've given everybody some documents here the other lawyers some documents, which may serve as exhibits. I'm going to identify the ones that I'm using and hand a copy to you.  Okay.  And those will serve as the court reporter's exhibits for the transcript here. If you don't recognize a document, you can tell me.  Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	WITNESS: Oh, okay.  Okay. I'm going to hand you a document I'm marking as Exhibit #1. It's called Notice of Deposition. Have you seen this document?  Yes, sir. Okay. You understand that it orders you to be here and you're here?  Yes, sir. Okay. Are you aware of why you're giving this deposition?  Yes, sir. Okay. Tell me briefly your understanding what's going on.  I'm required to be here. Okay. You know you've been sued?  Yes, sir. Okay. I'm going to hand you a document I'm going to mark as Exhibit #2 that's a big one.  It's got a whole lot of attachments, but it's called "Second Amended and Restated Complaint to an All Sheriff Sale and Other Relief". Have you

			T		
		9			10
1	Α	In its entirety, no, sir.	1	Q	Ms. Lollar, Mr. Lollar, Magnolia Island
2	Q	And it's a long document. It's not exciting	2		Plantation. You're currently employed by the
3		reading. Have you read any parts of it?	3		Bossier Parish Sheriff's Office; is that right?
4	A	(Witness examines document.) I believe so, yes.	4	Α	Yes, sir.
5	Q	Okay. We'll get back to the specifics of it in	5	Q	And what's your job title there?
6		a little bit, but I'll just tell you that's the	6	A	Records.
7		lawsuit, the petition	7	Q	And how long have you been there?
8	A	Okay.	8	Α	With the sheriff's office?
9	Q	complaint filed that named you as a	9	Q	Yeah.
10		defendant. I'm going to hand you a document I'm	10	Α	I have been there fifteen plus years.
11		labeling Exhibit #3. It's a Notice of Summons.	11	Q	A long time? How long have you had your current
12		COURT REPORTER:	12		job title as records?
13		Do you have a #2?	13	A	Two years I believe.
14		MR. MARTIN:	14	Q	Two years?
15		I do.	15	A	Two, maybe three.
16		COURT REPORTER:	16	Q	Okay.
17		Oh, part of that was oh, okay.	17	A	I'm not
18		MR. MARTIN:	18	Q	Back in 2018, what was your job title?
19		We're at $#2$ still, the big one.	19	Α	Civil department.
20	Q	Have you seen that document that I've handed	20	Q	Civil department.
21		you?	21	Α	Uh-huh.
22	A	No, sir.	22	Q	And how long had you been in that role?
23	Q	Okay. But you understand generally you've been	23	Α	I'm going to one to two years.
24		sued by my client?	24	Q	Relatively new at that point?
25	А	Yes, sir.	25	A	No, sir.
1	0	No? You thought one or two years was long		Δ	Oh I worked in administration a little also
1 2	Q	No? You thought one or two years was long	1	A	Oh, I worked in administration a little also.
2	Q	No? You thought one or two years was long enough time you didn't consider yourself a	1 2	Q	Oh, I worked in administration a little also. Okay. What took you to Civil?
2 3	~	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?	1 2 3	Q A	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall.
2 3 4	Q A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the	1 2 3 4	Q A Q	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay.
2 3 4 5	A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact	1 2 3 4 5	Q A Q A	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't
2 3 4 5 6	A Q	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.	1 2 3 4 5 6	Q A Q	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that
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2 3 4 5 6 7 8 9	A Q A Q	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018.  Okay. What was your training for that position	1 2 3 4 5 6 7 8 9	Q A Q A	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records,
2 3 4 5 6 7 8 9 10	A Q A Q A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018.  Okay. What was your training for that position like? Did you have any formal training?	1 2 3 4 5 6 7 8 9 10	Q A Q A Q	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records, but
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018. Okay. What was your training for that position like? Did you have any formal training? I was trained by Pat Taylor. Who is Pat Taylor? She is the lady that also worked in Civil Okay.  with me. There were two of us. Uh-huh. So, it was kind of a personal hands-on training? It wasn't a you didn't take	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records, but That's okay. Sounds vaguely right? I'm guessing. I Okay. It's not a quiz. I'm not I can't grade your homework. I can't Without looking at the Right records.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A Q A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018. Okay. What was your training for that position like? Did you have any formal training? I was trained by Pat Taylor. Who is Pat Taylor? She is the lady that also worked in Civil Okay.  with me. There were two of us. Uh-huh. So, it was kind of a personal hands-on training? It wasn't a you didn't take classes? Correct.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records, but That's okay. Sounds vaguely right? I'm guessing. I Okay. It's not a quiz. I'm not I can't grade your homework. I can't Without looking at the Right records. Okay. But Pat Taylor Ms. Pat Taylor gives you hands-on training that you learn as you go
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A Q A Q A Q	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018. Okay. What was your training for that position like? Did you have any formal training? I was trained by Pat Taylor. Who is Pat Taylor? She is the lady that also worked in Civil Okay.  with me. There were two of us. Uh-huh. So, it was kind of a personal hands-on training? It wasn't a you didn't take classes? Correct. It was you had previously been working in some other capacity with the sheriff's office? Yes, sir.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records, but That's okay. Sounds vaguely right? I'm guessing. I Okay. It's not a quiz. I'm not I can't grade your homework. I can't Without looking at the Right records. Okay. But Pat Taylor Ms. Pat Taylor gives you hands-on training that you learn as you go basically? I I'd say somewhat accurate. Okay. You can characterize it how you want.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q A Q A Q A	No? You thought one or two years was long enough time you didn't consider yourself a neophyte at that position in 2018?  No, one to two years. I wasn't sure of the exact Okay.  how long I had been Yeah.  in that position in 2018. Okay. What was your training for that position like? Did you have any formal training? I was trained by Pat Taylor. Who is Pat Taylor? She is the lady that also worked in Civil Okay.  with me. There were two of us. Uh-huh. So, it was kind of a personal hands-on training? It wasn't a you didn't take classes? Correct. It was you had previously been working in some other capacity with the sheriff's office?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	Oh, I worked in administration a little also. Okay. What took you to Civil? I don't really recall. Okay. I'm sorry, I don't That's fine. But at some point I guess that would be 2016-ish if you had been at 2018 you had been there about a year or two? 2016 or 2017 you moved from administrative to Civil? I'd have to look at the personnel records, but That's okay. Sounds vaguely right? I'm guessing. I Okay. It's not a quiz. I'm not I can't grade your homework. I can't Without looking at the Right records. Okay. But Pat Taylor Ms. Pat Taylor gives you hands-on training that you learn as you go basically? I I'd say somewhat accurate.

13 A Correct. 2 O ergage in some sort of break where you, you know, read a bunch of bodies of how to do this 5 O job, how to do this job? 5 O job, how to do this job? 6 A No, sir. 7 O You got shifted over to Civil? 8 A Correct. 9 O And you steared working? 9 O And you steared working? 10 A Correct. 11 O And you were given some responsibilities and Ms. 12 Taylor helped you along? 13 A Correct. 14 O Chay. Mast all did the civil department job 15 that you had entail? What were you dring on a few communicate through body language, ul-hah or shrive to-day busis? 16 A description 17 O Vas of shriffs sales, foreclosures, any type 18 O Sea, Sherriffs sales were something you were 24 doing on a daily busis? You were given case files and processing them and  15 Learning process bere? 1 A Jean Horne. 1 O May. Tean fixone we would ask our supervisor about. 1 O May. Tean fixone we would ask our supervisor about. 2 A Jean Horne. 3 O She year fixone we would ask our supervisor about. 4 A Jean Horne. 5 O May. Tean fixone we would ask our supervisor about. 5 O May. Tean fixone we would ask our supervisor about. 6 O May. Tean fixone we would ask our supervisor about. 7 A Jean Horne. 8 O Who, Yean fixone we would one as this supervisor? 8 A Jean Horne. 9 O Way. The hor fixone we would set on supervisor about. 10 O May. Tean fixone we would ask our supervisor about. 11 O May. Tean fixone we would ask our supervisor about. 12 O May. Tean fixone we would ask our supervisor about. 15 A Jean Horne. 16 O Par? 16 A Correct. 17 A Yes sign. 18 A Correct. 19 A No were diver supervisor? 20 Who slae is no your level that Jean Horne's specific sale. 21 O Way. The hor fixone we would set to Year this point. So, you're doing descripting on as you're going with help from Ms. Far Taylor. Anybody else had to help you in the work of these would go to Jean Horne. 21 O Way. The hor work of the work? 22 O Way. Was far the enly other one? 23 O Way. Was far the work? Who else would go to Jean Horne. 24 O Way. Was far the work? Wh	_					
2 COURT RECORDER:    A No. ir.			13			14
No. sir.   Social and banch of books of how to do this   10	1	Α		1	A	(Witness nods head.)
No. sir.	2	Q	engage in some sort of break where you, you	2		COURT REPORTER:
4 No. sir. 5 Q job, how to do this job? 6 A No. sir. 7 Q You got shifted over to Civil? 8 A Correct. 10 Q And you set activated working? 9 Q And J amould have told you that. 11 Q And you were given some responsibilities and Ms. 12 Taylor helped you along? 13 A Correct. 14 Q Okay. What all did the civil department job 15 that you had entail? What were you doing on a 16 day-to-day basis? 17 A We did sheriff's sales, foreclosures, any type 18 of service papers and that's the best 19 Q Yes. 19 Q Kes. 20 And J amould have told you that. 11 C I'm sorry. So, as I was saying earlier to make 12 it go smoother. In conversation a loc of times 13 we communicate through body language, uh-huh or 14 uh-th, but often the court reporter can't pick 15 that you had entail? What were you doing on a 16 day-to-day basis? 17 A We did sheriff's sales, foreclosures, any type 18 of service papers and that's the best 29 Q Yes. 20 And J amould have told you that. 21 Q Nobay. 22 Yes. 23 A I can 24 Q Nosy. 24 A -I can 25 Okay. 25 Taylor. Anythody else had to belp you story out here at 26 this point. So, you've fod ings ferred and a 27 we're just trying to get your story out here at 28 Taylor. Anythody else had to help you in the  18 A Correct. 19 Q Nobe was the supervisor? 29 Q Nobe, Jean Horne's in the civil department and 29 Shape shore would ask our supervisor about. 20 Q Nobe was the supervisor? 21 Q Nobe and the supervisor? 22 A I can 23 Q Nobe and process here? 24 A Jean Borne would consult with havid 25 Taylor. Anythody else had to help you in the  16 A Correct. 26 Q Moe Jean Horne's in the civil department and 27 Shape you are supervisor? 28 Q Moe else is on your level that Jean Horne's 29 Q offer. Jean Horne would go to Jean 29 Q Harle or or attorney. Mr. Jeans Sutherland. 20 A If we had any questions we would go to Jean 21 Horne with questions? 22 Q Nobe was a pour level that Jean Horne's 23 Q Nobe was Pat the only other one? 24 A Pet. 25 Taylor. Anythody else had to help you as you you how any you have a d	3			3		You need to say yes.
5 Q — job, how to do this job? 6 A No, sir. 7 Q You got shifted over to Civil? 8 A Correct. 9 Q And you started working? 10 A Correct. 11 Q And you were given some responsibilities and Ns. 12 Taylor helped you along? 13 A Correct. 14 the dock, What all did the civil department job that you had entail? What were you doing on a day-to-day basis? 17 A We did sheriff's sales, foreclosures, any type of service papers and that's the best — 18 Q Yss. 19 Q Yss. 20 A — description — 21 Q Okay. 22 A — I can — 23 Q So, shariff's sales were something you were doing on a daily basis? You were given case files and processing them and — 25 Taylor. Anybody else had to help you in the 26 A Nay questions we would ask our supervisor about. 3 Q Who was the supervisor? 4 A Jaan Bonne. 5 Q Okay. Jean Borne's in the civil department and she's your supervisor? 5 Q So, shariff's sour supervisor? 6 A Darrect. 8 Q Who lase is on your level that Jean Horne's ging to? 9 A Correct. 9 Q Yss. 9 Q So, shary shariff's wall so your supervisor about. 10 Q Okay. Jean Borne's in the civil department and she's your supervisor? 15 A Fit we had any questions we would op to Jean Horne would consult with hevid and horne with questions? 15 A Pat. 16 Q Bat? 17 A Yee, sir. 18 Q Okay. Nas Pat the only other one? 19 A Ti Civil? I heliewe at the time, yes. 20 Q Okay. So, when y'all got a file it was either you or Pat that was — 21 Q Okay. So, when y'all got a file it was either you or Pat that was — 22 Q Okay. So, when y'all got a file it was either you or Pat that was — 23 Q Okay. So, when y'all got a file it was either you or Pat that was — 24 A Correct. 25 Q Okay. So, when y'all got a file it was either you or Pat that was — 26 Q Okay. So, when y'all got a file it was either you or Pat that was — 27 Q Ok	4	Α		4		
6 A Mo, sir. 7 O You got shifted over to Civil? 8 A Correct. 8 A Correct. 10 Q And you started working? 9 Q And you started working? 11 Q And you were given some responsibilities and Ms. 11 Q I'm soury. So, as I was saying earlier to make it go smoother, in conversation a lot of times we communicant through body language, uh-huh or uh-uh, but often the court reporter can't pick that up heed entail? What were you doing on a day-to-day basis? 16 A Correct. 17 A We did sheriff's sales, foreclosures, any type of service papers and that's the best — 18 Corvers of service papers and that's the best — 19 Q Yee. 19 Q Yee. 19 Q Yee. 20 So, sheriff's sales were something you were doing on a daily basis? You were given case files and processing them and — 21 Correct. 22 A — I can — 23 Q So, sheriff's sales were something you were doing on a daily basis? You were given case files and processing them and — 25 Tiles and processing them and — 26 A Ary questions we would ask our supervisor about. 27 A Correct. 28 Q Who was the supervisor? 39 Q Who was the supervisor? 40 A Jean Borne. 40 A Jean Borne. 50 Q Who. Jean Horne's in the civil department and she's your supervisor? 41 A Jean Borne. 42 A Part good of service papers and that start with Part of the process. 43 Q Who was the supervisor? 44 A Jean Borne. 50 Q Who sale is on your level that Jean Horne's going for? 51 A If we had any questions we would go to Jean Horne would consult with Thevid Horney. Mr. James Sutherland. 51 Miler or our attorney. Mr. James Sutherland. 52 Miler or our attorney. Mr. James Sutherland. 53 Q Way. So, when y'all got a file it was either you put were looked at that statute in a hook or — "Okay. So, when y'all got a file it was either you you re of doing the sheriff sales, you ever looked at that statute in a hook or — "Oline? (Nay. In the course of doing the sheriff sales, you ever looked at that statute in the course of doing the sheriff sales, wo often — let me back up. In the course of doing the sheriff sales, wo file and you have? How was the	5	0	•	5		Oh. I'm sorry.
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9 Q And you started working? 10 A Correct. 11 Q And you were given some responsibilities and Ms. 12 Taylor helped you along? 13 A Correct. 14 Q Okay. What all did the civil department job 15 that you had entail? What were you doing on a 16 day-to-day basis? 17 A We did sheriff's sales, foreclosures, any type 18 of service papers and that's the best. 19 Q Yes. 10 A Taylor helped you along? 11 A Okay. 12 A description 13 Q Okay. 14 A description 15 Q Okay. 25 So, sheriff's sales were something you were 26 doing on a daily basis? You were given case 27 diles and processing them and 28 Q Now was the supervisor? 29 A No Lise is on your level that Jean Horne. 20 A Now was the supervisor? 21 Q Okay. Jean Borne. 21 Q Okay. Jean Borne's in the civil department and she's your supervisor? 22 A Nouse of the had any questions we would go to Jean 11 Horne. Jean Horne would consult with David 12 Miller or our attorney, Mr. Janes Sutherland. 13 Q But who is the "wer?" Who else would go to Jean 14 Yes, sir. 15 A Pat. 16 Correct. 17 A Yes, sir. 18 Correct. 19 A Tigologize. 19 Q Now Was Pat the only other one? 20 Q Okay. So, when y'all got a file it was either 21 You or Pat that was 22 A Correct. 23 Q Okay. So, when y'all got a file it was either 24 Q Okay. So, when y'all got a file it was either 25 Q Okay. So, when y'all got a file it was either 26 Q Okay. So, when y'all got a file it was either 27 you or Pat that was 28 Q Okay. So, when y'all got a file it was either 29 You or Pat that was 20 Q Okay. So, when y'all got a file it was either 29 You or Pat that was 20 Q Okay. So, when y'all got a file it was either 20 Q Okay. Was Pat the only other one? 21 Q coling the work? Okay. And I take it 22 A Correct. 23 Q tan We library. So, you were doing sales sheriff sales, tyou of the department and she it go sone there? 24 A Destroy for the department and she it go sone the part of the department and she it go sone the part of t	1	~		'		
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	20 21 22	A	Correct.	22	Q	sheriff sales, how often let me back up. In
25 to her more often   25 MR. LANGLEY:	20 21 22 23	A	Correct doing the work? Okay. And I take it	22 23	Q	sheriff sales, how often let me back up. In the course of doing the sheriff sales, typically
	20 21 22 23 24	A	Correct doing the work? Okay. And I take it probably she's more experienced, so you're going	22 23 24	Q	sheriff sales, how often let me back up. In the course of doing the sheriff sales, typically what's the role of the appraisers in these?

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		17			18
1		Object to the form of the question, but	1	Q	You would do the selecting?
2		you can answer if you have the answer.	2	A	I mean, I didn't it was sorry, I'm trying
3	А	Could you repeat that, I guess?	3		to think of the best way to word it.
4	0	Sure.	4	Q	Sure.
5	A	I'm not	5	A	I don't have a word.
6	0	Restate it more clearly? My understanding of	6	0	Okay.
7	Q	sheriff sales is that usually one side of	7	A	I'm sorry, I don't know how to describe it, but
8		let's say a seized piece of property gets an	8	А	it was just whatever was next on the list if
		appraiser gets to pick one. The other side gets			
9			9	0	that's
10	_	to pick one as well. Is that your experience?	10	Q	Okay. Did you see that it's your job to appoint
11	A	No.	11	_	an appraiser?
12	Q	No? Do you deal with appraisers or did you in	12	A	No.
13		your role as in Civil in this	13	Q	Whose job was it?
14	A	Yes.	14	A	I thought that was Louisiana law that stated
15	Q	You did. When would you deal with appraisers?	15		that you had to.
16	A	Prior to the sale we would have to I guess	16	Q	Okay. When you had a judgment against a party
17		Louisiana law requires you if it is with an	17		and their property was being seized, would that
18		appraisal you would have to get an appraisal.	18		go to a sheriff sale usually?
19	Q	Who would get the appraisal?	19		MR. LANGLEY:
20	Α	There was a we just had a list of appraisers,	20		Object to the form of the question.
21		real estate or I'm sorry, moving and non-	21	Α	I don't remember. I'm sorry, I don't.
22		moving	22	Q	Okay.
23	Q	Okay.	23	A	It's been a while.
24	Α	and we would just select one from the list or	24	Q	Sure. Do you have any recollection of a third
25		just whomever's up next.	25		appraiser being necessary in some cases?
			1		
		19			20
1	А	Yes.	1	Q	And you said you didn't think you selected the
1 2	A Q		1 2	Q	And you said you didn't think you selected the first two appraisers. Did you select a third
		Yes. Okay. When would a third appraiser be necessary?		Q	And you said you didn't think you selected the
2		Yes. Okay. When would a third appraiser be	2	Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.
2	Q	Yes. Okay. When would a third appraiser be necessary?	2 3	~	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?
2 3 4	Q	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the,	2 3 4	Ā	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.
2 3 4 5	Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants.	2 3 4 5	A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually?
2 3 4 5 6	Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one	2 3 4 5 6	A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for
2 3 4 5 6 7	Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two	2 3 4 5 6 7	A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so
2 3 4 5 6 7 8	Q A Q	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers?	2 3 4 5 6 7 8	A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually?  In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up,
2 3 4 5 6 7 8 9	Q A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two.	2 3 4 5 6 7 8	A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes
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2 3 4 5 6 7 8 9 10 11	Q A Q A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two	2 3 4 5 6 7 8 9 10 11 12	A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.
2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one and the judgment debtor would get	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one and the judgment debtor would get one? No. Just two anybodies?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?  No, sir. I'm not sure where the list Okay.  It's just part of my
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A Q A A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one and the judgment debtor would get one? No. Just two anybodies? Yes. Okay. So, if their those appraisals were	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?  No, sir. I'm not sure where the list Okay.  It's just part of my But this was something internal to your office? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q A A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one and the judgment debtor would get one? No. Just two anybodies? Yes. Okay. So, if their those appraisals were more than ten percent (10%) apart in monetary	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?  No, sir. I'm not sure where the list Okay.  It's just part of my But this was something internal to your office? Yes.  Okay. So, somewhere in your office there would
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one? No. Just two anybodies? Yes. Okay. So, if their those appraisals were more than ten percent (10%) apart in monetary value, you'd get the third appraiser?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?  No, sir. I'm not sure where the list Okay.  It's just part of my But this was something internal to your office?  Yes.  Okay. So, somewhere in your office there would be a list
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A	Yes. Okay. When would a third appraiser be necessary? Whenever the two appraisers were outside of the, I believe, ten percent (10%) variants. And we had just been talking about one appraiser. What would necessitate two appraisers? I believe every sale had to have two. Okay. That may be the law that says Okay. And so at that when you say two appraisers, did you understand it to mean that one side would get one judgment creditor would get one and the judgment debtor would get one? No. Just two anybodies? Yes. Okay. So, if their those appraisals were more than ten percent (10%) apart in monetary value, you'd get the third appraiser? Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A	And you said you didn't think you selected the first two appraisers. Did you select a third appraiser usually in these cases?  No.  Okay. Who selected the third appraiser usually? In a movable like there was a list for movable appraisers, a list for non-movable, so there were just it was whomever was next up, I suppose if that makes But who would pick those people? Were they your list?  No.  That's not your list?  No, sir.  It's the sheriff's list?  No, sir. I'm not sure where the list Okay.  It's just part of my But this was something internal to your office? Yes.  Okay. So, somewhere in your office there would be a list Uh-huh.

21 to 24 22 1 you never consulted that when you were doing the 1 required for more than ten percent (10%)? 2 appraisal selection? 2 I'm not familiar with it. Α 3 No, sir. 3 Α Okav. 4 Q You just went down your list because that's what 4 Α So --5 Ms. Pat Taylor told you to do? 5 Q You saw that as kind of a legal issue? 6 Α Yes, sir. 6 Α 7 7 Q Or perhaps Ms. Jean Horne? Q That goes without saying you didn't have 8 Pat, yes. 8 specific training about this situation with an Α 9 Okay. I take it there was no written guidelines 9 appraiser? 10 in the office of what to do? MR. LANGLEY: 10 11 No, sir. 11 Object. Object to the form of the Α It was just a list and someone told you if 12 question. What situation are you referring 12 0 13 they're more than ten percent (10%) apart, call 13 to, Counselor? the next person on this list? 14 MR MARTIN: 14 15 Α I believe it was because it was the law is why -15 The necessitation for a third 16 16 appraiser. 17 Q But someone told you that? 17 MR. LANGLEY: 18 Α Yes, sir. 18 Okay. Thank you. You can answer the 19 Okay. And you don't know if that was Ms. Pat 19 question if you have an answer. Did you Q 20 have specific training about third appraiser Taylor? 20 21 Α I believe it was going to be Pat Taylor. 21 being necessary? 22 22 Α No. 0 She's the one who did all my training. 23 But you did understand the third appraiser to be 23 Q Α 24 Okay. So, no written quidelines, just -- I take 24 something selected by y'all's office -- your 25 it you don't know why a third appraiser would be 25 office? 23 24 I think you said the list of appraisers was 1 In this particular situation or in general? 1 Q Α 2 In general. 2 different as well. Is that right? 3 In -- I guess in movables and non-movables or 3 Yes, sir. Α Α 4 real estate and movables -- I guess I'm just not 4 0 Okay. And you said if the appraisals, the first 5 sure. Can you repeat that or rephrase that? 5 two, differed by more than ten percent (10%), With the third appraiser if one would need to be 6 you'd get that third appraiser? 6 Q 7 selected in any sale, you thought it was the 7 Correct. Α 8 sheriff's office selecting from its own list, 8 Who did that calculation of whether there was a 9 correct? 9 ten percent (10%) discrepancy? 10 On real estate and movables, yes. 10 I don't recall how we came to determine what it Α Α 11 Okay. Had you ever heard the term "referee 11 12 appraiser"? 12 Q You don't recall for instance taking out a 13 No, sir. 13 calculator and adding up the values and seeing Α 14 Q Neutral appraiser? 14 if they differed by --No, sir. 15 I don't recall how --15 Α Α Can you try to tell me the difference for 16 16 Q Okav. Q procedures for movable and immovable property? -- how we did that, no. 17 17 Α 18 You discussed that a couple of times. 18 0 Do you recall if you would have Jean Horne do 19 It's been a while since I have, so I don't 19 Α remember the specifics of it, so I wouldn't --Prior to any sale or advertising I would let 20 20 Α

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Jean Horne review it then -- the file.

this lawsuit's about?

Okay. Back to the long Exhibit #2 -- and you

don't have to scour it for everything -- just

generally what do you know? Do you know what

I --

different.

You recall that there was a difference?

Yes, sir, in advertising and things of that

nature. There were a few things that were

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22 Q

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		25			26
1	А	Not much about it at all.	1	0	For instance, my client is this is Barbara
2	0	Okay. Have you read any of the allegations that	2	~	Lollar and her husband, Mr. Ronald Lollar.
3	~	concern you in that long complaint?	3	А	No, sir.
4		MS. JONES:	4	Q	You're not familiar with them?
5		Object to the form.	5	A	No, sir.
6	А	I have. There's just some of the legal I	6	Q	Do you know Mr. William A. Lucky, III Buddy
7	Λ	guess I'm not understanding, you know, the	7	×	Lucky?
8		entirety of it, but	8	A	No, sir.
9	Q	Do you understand what the allegations about you	9	Q	Vickie Lucky?
10	Q	are?	10	Q A	(Witness shakes head.)
11	А	I quess no.	11	0	Okay. You don't personally know any of these
12	0	Do you understand what sale it concerns?	12	V	people?
13	Q A	Yes, sir.	13	A	No, sir.
14	0	Okay. And would that be the sale promissory	14	Q	Okay. You do know Sheriff Whittington?
15	Q	note in 2018?	15	Q A	Yes, sir.
16	7\	Yes, sir.	16		·
17	A	Okay. And do you remember that promissory note	17	Q	Okay. He is a defendant, but that's the only
18	Q	and that sale?		71	one you personally know?
	7\		18 19	A	Yes, sir.
19	A	I remember some, yes.		Q	You're represented by Mr. Langley in this suit;
20	Q	Okay. Do you know anything about the lawsuit	20	71.	is that right?
21	71	that preceded that sale?	21	A	Yes, sir.
22	A	No, sir.	22	Q	Have you spoken with any of the other lawyers in
23	Q	Okay. Do you know any of the parties in this	23	71.	this case about the suit?
24	71	suit, the plaintiffs or defendants?	24 25	A	No, sir.
۵۵_	Α	No.	∠5	Q	When did you learn about this lawsuit and that
			+		
		27			28
1		you were a defendant in it?	1		28 but I don't know.
1 2	A			Q	
	A	you were a defendant in it?	1	Q	but I don't know.
2	A Q	you were a defendant in it? I suppose whenever I was served with the	1 2	Q	but I don't know. That's fine. Okay. I'm going to hand you a
2		you were a defendant in it? I suppose whenever I was served with the paperwork.	1 2 3	Q	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a
2 3 4	Q	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay.	1 2 3 4		but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.
2 3 4 5	Q A	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date.	1 2 3 4 5	A	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?
2 3 4 5 6	Q A Q	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date. Would that be this year?	1 2 3 4 5 6	A	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?  I trust your pronunciation more than mine. I
2 3 4 5 6 7	Q A Q A	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date. Would that be this year? Yes, sir.	1 2 3 4 5 6 7	A	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?  I trust your pronunciation more than mine. I call it a Writ of FIFA. Do you recognize this
2 3 4 5 6 7 8	Q A Q A	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date. Would that be this year? Yes, sir. Were you aware of the lawsuit prior to that?	1 2 3 4 5 6 7 8	A Q	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?  I trust your pronunciation more than mine. I call it a Writ of FIFA. Do you recognize this Writ?
2 3 4 5 6 7 8 9	Q A Q A	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date. Would that be this year? Yes, sir. Were you aware of the lawsuit prior to that? There was an affidavit I had signed and I'm not	1 2 3 4 5 6 7 8	A Q	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?  I trust your pronunciation more than mine. I call it a Writ of FIFA. Do you recognize this Writ?  Yes, sir.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	you were a defendant in it? I suppose whenever I was served with the paperwork. Okay. I'm not sure of the date. Would that be this year? Yes, sir. Were you aware of the lawsuit prior to that? There was an affidavit I had signed and I'm not sure it was Okay. You don't know if it was connected to this suit or not? (Witness shakes head.) But of the lawyers involved in this suit, the only one you've spoken to is Mr. Langley? Correct. Yes, sir. Have you spoken to Ms. Julianna Parks about this lawsuit? About this? She's Yeah. I'm not asking you the content of your conversation, just if you've spoken to her about it. She took my affidavit	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A	but I don't know.  That's fine. Okay. I'm going to hand you a document. I'm marking it as Exhibit #5. It's a Writ of Fieri Facias.  Fieri Facias?  I trust your pronunciation more than mine. I call it a Writ of FIFA. Do you recognize this Writ?  Yes, sir.  It looks like it is dated June 7, 2018. Does that seem right?  That's what it appears; yes.  Do you remember getting this in July of 2018?  I do not.  Okay. Do you think you did get it?  I remember when it came in, but I don't remember the details of  Were you managing this file when this came in?  Prior to this I don't think there was a file to my knowledge.  Okay. How would a file be assigned between you and Ms. Pat Taylor?  It was just a random assignment. She would do

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		29			30
1	Q	Okay. And this is Docket #C-127573. That's an	1	Α	No, sir. I do not.
2		odd number, so this became yours?	2	Q	If it's not yours, whose could it be?
3	Α	Yes, sir.	3		MR. LANGLEY:
4	Q	Okay. So, you don't recall specifically this in	4		I'll caution you, Liz, not to
5		June of 2018, but you do know that at some point	5		speculate. If you know give him an answer;
6		after that you were assigned to this case?	6		don't guess.
7	A	Correct.	7		MS. JONES:
8	0	This file?	8		I'll object to form.
9	~ A	Yes.	9	А	I'm sorry, I don't I don't know.
10	Q	Was there anything attached to this; do you	10	Q	Would anyone else have taken a note about one of
11	~	remember? Would a judgment be attached to it?	11	~	your assigned cases?
12	А	I do not I do not know.	12		MS. JONES:
13	0	Okay. We're going to go to #6. I'm marking	13		Same objection.
14	×	Exhibit #6. It is appears to be a note maybe	14		MR. LANGLEY:
15		drafted in Microsoft Word or something and it's	15		Same instruction. If you know
16		dated 6-12-2018. Is this your note?	16	А	Yeah, I do not. There's no way to
17	А	I do not know.	17		Did you often take notes at this time in mid
			18	Q	-
18	Q	It says, "Called Curtis Shelton, 227-3306, at		7	2018 about your files?
19		11:05 according to the Writ of FIFA. He said to hold off on the Writ because he's issued a	19	A	Yes.
20			20	Q	Where would these notes go?
21		subpoena for Barbara Carter to produce the	21	Α	This would be in the file or on the file I'm
22		promissory note on July 5, 2018." He said, "He	22	0	guessing.
23		may want us to seize the note on that court date	23	Q	When you say on the file, do you mean
24		and would be in contact with us before July	24		electronically? Are these stored somewhere?
25		5th." So, you do not know if this is your note?	25	A	If anything was written on the file itself.
		31			32
1	Q	You got a physical folder?	1		Well, and that
1 2	Q A		1 2		-
	~	You got a physical folder?			Well, and that
2	Ā	You got a physical folder? Yes.	2		Well, and that MS. JONES:
2	Ā	You got a physical folder? Yes. Okay. You had a folder that was your you had a series of folders that were yours?	2 3		Well, and that MS. JONES: If that's a
2 3 4	A Q	You got a physical folder? Yes. Okay. You had a folder that was your you had a series of folders that were yours? Documents were kept in folders, yes, sir.	2 3 4		Well, and that MS. JONES:  If that's a MR. MARTIN:  I'm re-stating the previous answer and
2 3 4 5	A Q A	You got a physical folder? Yes. Okay. You had a folder that was your you had a series of folders that were yours? Documents were kept in folders, yes, sir. Were those at your desk?	2 3 4 5		Well, and that MS. JONES:  If that's a MR. MARTIN:
2 3 4 5 6 7	A Q A Q A	You got a physical folder? Yes. Okay. You had a folder that was your you had a series of folders that were yours? Documents were kept in folders, yes, sir. Were those at your desk? Yes, sir.	2 3 4 5 6 7		Well, and that MS. JONES:  If that's a MR. MARTIN:  I'm re-stating the previous answer and I'm using that to ask the question. MS. JONES:
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		33			34
1	Q	You told me just a minute ago you didn't know if	1	Q	Okay. What did you do with old folders once for
2		this was your note.	2		instance a case was resolved?
3	Α	Correct.	3	Α	I'm not sure what we did with them. I'm sorry.
4	Q	You said you had a folder which may contain	4		I apologize.
5		notes. Do you have that folder still?	5	Q	It's okay. I believe you said that if you had
6	A	Oh, no, sir. No.	6		notes you would put them in the folder
7	Q	Do you know if there were other notes in it?	7	Α	Correct.
8	A	No, I do not.	8	Q	for that file?
9	0	Do you know if you ever took notes about this	9	A	Yes.
10	~	matter?	10	0	Did you do that often? Did you often take notes
11	А	Like phone messages? What do you mean by like	11	~	for files?
12		notes or	12	А	Occasionally, yes.
13	Q	Anything that would have gone in the folder.	13	0	Did you often call attorneys who represented
14	Ā	If it was a note or anything it should be in the	14	~	seizing creditors in connections to your case
15		folder.	15		files?
16	Q	Okay. Have you handed over any notes that you	16		MS. JONES:
17	×	have to your attorney?	17		Object to the form
18	А	I don't have any notes, sir.	18		MR. LANGLEY:
19	0	If you had any notes, would you have left them	19		Object to the form
20	Q	at the sheriff's civil department when you moved	20		MS. JONES:
21		to your new position?	21		of the question.
22	А	It would be in the file.	22		MR. LANGLEY:
23			23		
24	Q	Okay. Do you know who would have control over those now?	24	7\	of the question.
25	7\	I'm not sure when I left Civil. I don't know.	25	A	Do you want me to answer? You
45	A	I III NOC Sale When I left CIVII. I don't know.	23	Q	10u
1		MC TONTEG:			36
1		MS. JONES:	1		did you often communicate with Counsel for the
2	0	MS. JONES: Can still answer.	1 2		did you often communicate with Counsel for the seizing party?
2	Q	MS. JONES:  Can still answer.  can still answer.	1 2 3		did you often communicate with Counsel for the seizing party?  MS. JONES:
2 3 4	A	MS. JONES:  Can still answer.  can still answer. Okay.	1 2 3 4		did you often communicate with Counsel for the seizing party?  MS. JONES:  I'm going to object to the form.
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			1		
		37			38
1		I object to the form of the question.	1		MR. LANGLEY:
2		That's too vague to be susceptible of a	2		Let's go off the record for a second
3		coached answer. Try it out.	3		just for a second.
4		MR. MARTIN:	4		(OFF RECORD.)
5		If she can't understand what I'm asking	5		COURT REPORTER:
6		she can say that and ask me to repeat it.	6		Ms. Jones, do you want a copy?
7		MS. JONES:	7		MS. JONES:
8		He's entitled to state his form	8		No thank you.
9		objection on the record. He's not	9		COURT REPORTER:
10		instructing her not to answer.	10		Mr. Shelton, do you want a copy?
11		MR. MARTIN:	11		MR. SHELTON:
12		He's saying if it's too vague to	12		Yes.
13		answer. If she thinks	13		MR. MARTIN:
14		MS. JONES:	14		I can restate it again if you'd like.
15		That's his form objection.	15		MR. LANGLEY:
16		MR. MARTIN:	16		Please do.
17		If she thinks it's too vague, she can	17	A	Can you re
18		tell me it's too vague.	18	EXA	MINATION BY MR. MARTIN, CONTINUING:
19		MS. JONES:	19	Q	Yes. When dealing with seizures, did you
20		He can still make an objection.	20		distinguish in general, did you distinguish
21		MR. LANGLEY:	21		between counsel for the judgment creditor and
22		All right. Can we go off the record	22		counsel for the judgment debtor?
23		for a second.	23		MR. LANGLEY:
24		MR. MARTIN:	24		I object to the form of the question as
25		Sure.	25		being too vague to be susceptible for cogent
1		39 answer. If you have an answer, you may give	1	A	40 We would communicate. I wouldn't say reach out.
2		it to Counsel.	2	Q	You'd communicate. How would you distinguish
3	А	I don't I guess I'm not understanding the	3	×	between communicating and reaching out?
4		distinguish.	4	А	If there were questions, I would ask my
5	Q	You just understood there to be lawyers?	5		supervisor, Jean, who would speak with Mr.
6	Ā	Yes.	6		Sutherland and he would advise us on what we
7	0	Did you understand the distinction between	7		would need to do as far as if we needed to ask a
8	~	judgement creditors and judgment debtors?	8		question.
9	А	Somewhat, yes.	9	Q	Okay. So, you would reach out or communicate
10	Q	Could you explain how you distinguish those two?	10	A	Yes.
11	Ā	I couldn't now. I'm sorry. Then it was fresh	11	Q	with attorneys upon instructions from Mr.
12		on my mind, but now it's	12	~	Sutherland?
13	Q	Did you understand it to mean that one party had	13	A	Yes, sir.
14		property that was seized, another party was	14	Q	Would you do it before speaking with Mr.
15		seizing it?	15		Sutherland in any case?
16	A	Yes, sir.	16	A	I guess I'm kind of a little confused. If if
17	Q	Okay. And both parties would generally have	17		someone were to send in something and we needed
18		attorneys?	18		additional information or something of that
19	А	Yes, that's correct.	19		nature, we would inquire about it that way if
20	Q	And so when you say reach out to the attorneys,	20		that's
21		you mean both sides?	21	Q	Okay. Inquire with the attorney or with Mr.
22	Α	Correct.	22		Sutherland?
23	Q	So, you would generally reach out to both sides?	23	Α	With the attorney.
24		MR. LANGLEY:	24	Q	Okay. So, sometimes you would reach out to the
25		Objection.	25		attorney without speaking to Mr. Sutherland?
1			1		

		1		
	41			42
1	MR. LANGLEY:	1	Q	When you say things of that nature, are you
2	Or Ms. Horne, don't forget that part.	2		saying you would not go to Mr. Sutherland for
3	MR. MARTIN:	3		that?
4	Can we let her answer?	4	A	If they left off a zip code, no, sir. I
5	MR. LANGLEY:	5		wouldn't ask him about that. I would
6	Well, you're misstating her answer.	6	Q	I think I understand.
7	She said	7	Α	because
8	MR. MARTIN:	8	Q	In those cases, you would just proceed directly
9	She did not mention Ms. Horne.	9		to an attorney?
10	MR. LANGLEY:	10	A	Just to ask for clarification on
11	Yes, she did.	11	Q	Okay. That makes sense. Now, I know this is a
12	MS. JONES:	12		few years back. June 12, 2018, do you know if
13	Yes, she did.	13		you knew who Mr. Curtis Shelton was at this
14	MR. MARTIN:	14		point?
15	She mentioned Ms. Horne twenty minutes	15	Α	No, sir.
16	ago. I'm asking her	16	Q	You know who Mr. Curtis Shelton is now?
17	MR. LANGLEY:	17	Α	No. No, sir. I've not heard
18	Okay. Fine, Counsel.	18	Q	Okay. Does the name ring a bell?
19	MR. MARTIN, CONTINUING:	19	Α	From this lawsuit, yes, sir.
20	A I'm trying to think for non for clerical	20		MR. LANGLEY:
21	issues	21		All right. Let's take a short five-
22	Q Okay.	22		minute.
23	A like a misspelling or if a phone number was	23		MR. MARTIN:
24	left off or things of that nature, not subject	24		Sure.
25	matter.	25		(OFF RECORD.)
	43			
1	EXAMINATION BY MR. MARTIN, CONTINUING:	1	Q	Okay. We'll move on to what I'm marking as
2	EXAMINATION BY MR. MARTIN, CONTINUING: Q Okay. We were looking at what I had marked as	1 2	Q	Okay. We'll move on to what I'm marking as Exhibit #7. This is with the letterhead of
2 3	EXAMINATION BY MR. MARTIN, CONTINUING:  Q Okay. We were looking at what I had marked as Exhibit #6, this note. And I'm not going to	1 2 3	Q	Okay. We'll move on to what I'm marking as Exhibit #7. This is with the letterhead of Bossier Parish Sheriff's Office and it's signed
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2 3 4 5 6	EXAMINATION BY MR. MARTIN, CONTINUING:  Q Okay. We were looking at what I had marked as Exhibit #6, this note. And I'm not going to belabor this point. You said you don't remember if this is your note. You don't remember if you knew who Curtis Shelton was at that time. But	1 2 3 4 5 6	~	Okay. We'll move on to what I'm marking as Exhibit #7. This is with the letterhead of Bossier Parish Sheriff's Office and it's signed by a Kimberly E. Flournoy. Yes. This letter's dated July 5, 2018. You did write
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Selton?  A In any — in any suit as Fat Taylor trained me would have to have funds available to start filing and if the funds were not there, we would have to send out the standard letter.  O Who would that letter go to?  A Monewort the attorney was for the — I guess for the Milt that was —  To Q No, it would go to an attorney. How did you lo good the Milt that was —  O So, it would go to an attorney. How did you lo good the Milt that was —  A It should — the attorney on the Mrit. 11 decide which attorney it would go to? 12 A It should — the attorney on the Mrit. 12 Selton?  Yes, because his name is on the Mrit. 12 Company. Taken who were dealt with the seinure of a promisory note? Who this point if the would have gone?  A Yes, sir. 1 Selton was prior to June 12th. 15 Selton was prior to June 12th. 16 Selton was prior to June 12th. 17 Selton was prior to June 12th. 18 Selton was prior to June 12th. 19 A Yes, sir. 19 A Yes,			45			46
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5	3	A	In any in any suit as Pat Taylor trained me	3		and answered at least twice.
have to send out the standard letter.	4		we would have to have funds available to start	4		MR. MARTIN:
7   Q   Mho would that letter go to?   8   A   Mhomewer the attorney was for the — I guess for 9   the Write that was —   9   Shelton?   9   Shelton?   10   Q   So, it would go to an attorney. Kew did you   11   Q   Kay. You don't remember if you had   12   A   It should — the attorney on the Writ.   12   Cokay. You don't remember if you had   13   A   No, sir.   14   Edulbit #5, the Writ. On the hottom left it   14   Edulbit #5, the Writ. On the hottom left it   15   says, "Attorney Curtis Hart Shelton." Is that   16   identification with you would have gone?   16   identification with him prior to this?   17   identification with him prior to this?   18   is this the first time you ever dealt with the seizure of a promissory note?   18   is this the first time you ever dealt with the seizure of a promissory note?   18   is this the first time you ever dealt with the seizure of a promisory note with him prior to this?   18   is this the first time you ever dealt with the seizure of a promisory note was a locked up.   18   is this the first time you ever dealt with the seizure of a promisory note was a locked up.   18   is this the first time you ever dealt with the seizure of a promisory note was an answer it to humble?   18   is this the first time you ever dealt with the seizure of a promisory note was an answer.   18   is this the first time you	5		filing and if the funds were not there, we would	5		Feel free to answer.
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the Writ that was —  0 So, it would go to an attorney. How did you  11 decide which attorney it would go to?  12 A It should — the attorney on the Writ.  13 Q And we'll go back to what I've marked as  14 Exhibit #5, the Writ. On the bottom left it  15 says, 'Attorney Curtis Hart Shelton.' Is that  16 identification why you would have gone?  17 A Yes, sir.  18 Q But you said earlier you don't remember if you  18 Q But you said earlier you don't remember if you  19 knew who Mr. Shelton was prior to June 12th.  20 MS. JONES:  21 Object to the form.  22 MR. LANGLEY:  23 Is there a question pending?  24 Q You did not know prior to June 12, 2018 who Mr.  25 Shelton was?  26 A You did not know prior to June 12, 2018 who Mr.  3 O Of July 5, 2018.  4 A Would I have access to it?  5 A Would you have access to the physical note at  47 I this point?  1 A Thus locked up.  2 A Of July — what point at —  3 O Of July 5, 2018.  4 A Would I have access to it?  5 A Won would have had it?  6 A No, sir. No, sir.  7 Q Who would have had it?  8 A It was locked up at?  9 Where does it get locked up at?  10 A I'm not sure. That's something you'd have to  11 ask —  12 MR. LANGLEY:  13 If you're not sure, that's your answer.  14 Q Was seized property often locked up in this  15 place?  16 A No, sir.  17 O Where was seized property usually kept?  18 A Ethibit #5, the Writ.  19 A Thus locked up.  10 O Where was seized property usually kept?  10 Where was seized property usually kept?  11 A Thus making?  12 A Of you're not sure, that's your answer.  13 D Where was seized property usually kept?  14 A No, sir.  15 A Correct.  16 A No, sir.  17 O Where was seized property usually kept?  18 A Ethibit the first time you don't thin brie in the seizume of a promissory note was locked up.  19 A I'm not sure.  10 O Livil Department or Sheriff's Office?  21 When you said that we have received the original promissory note?  22 A I do not — not that I would know of.  23 B I do not — not that I would know of.  24 B I do not — not that I would know of.	8	A		8	Q	Okay. But you would have sent this fax to Mr.
11 decide which attorney it would go to? 12 A It should — the attorney on the Writ. 13 Q And we'll go back to what I've marked as 14 Exhibit #5, the Writ. On the bottom left it 15 says, "Attorney Curtis Hart Shelton." Is that 16 identification why you would have gone? 17 A Yes, sir. 18 Q But you said earlier you don't remember if you 18 R. LANKIEY: 19 A Yes, sir. 19 knew who Mr. Shelton was prior to June 12th. 19 knew who Mr. Shelton was prior to June 12th. 19 LANKIEK: 20 MS. JONES: 21 Object to the form. 21 Department or Sheriff's Office? 22 No. sir. 23 Is there a question pending? 24 Q You didn not harw prior to June 12, 2018 who Mr. 25 Shelton was? 26 A Of July — what point at — 27 A Of July — what point at — 28 A Of July — what point at — 3 Q Of July S, 2018. 4 A Would I have access to it? 2 A Of July — what point at — 3 Q Of July S, 2018. 4 A Would I have access to it? 4 A Would I have access to it? 5 Q Was it at your desk, for instance? 6 A No. sir. No. sir. 7 Q Who would have beat locked up at? 8 A It was locked up. 9 Q Where does it get locked up at? 1 MR. LANKIEY: 1 MR. LANKIEY: 2 MR. LANKIEY: 3 Decrease of a promissory note? 48 1 Q So, nothing else would have been locked up in this place? 49 Q Whore was seized property usually kept? 40 A Ten not sure. That's something you'd have to look as seized property often locked up. 10 A Ten not sure. That's something you'd have to look as seized property usually kept? 19 Q Where was seized property usually kept? 10 A Ten not sure. That's something you'd have to look as seized property usually kept? 10 A Ten not sure. That's something you'd have to look as seized property usually kept? 17 A MR. LANKIEK: 18 A We dish't look up seized property. This la promissory note was locked up. 19 Q So, nothing else would have been locked up at through some sort of safe? 10 You're knowledge from what you remember, is this your first comminication to Mr. Shelton is so I don't know if I've ever talked to him in my life before. 2 A It same locked up. 2 A Correct. 3 Copication to	9			9	~	
decide which attorney it would go to?  A It should — the attorney on the Writ.  A No, sir.  A Ves, sir.  MELANNIEF:  A For July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  3 Q Of July — what point at —  4 A Would I have access to it?  5 A It was locked up.  6 A No, sir. No, sir.  7 O Who would have been locked up at?  8 A It was locked up.  9 Q Where does it get locked up at?  1 If was locked up.  1 A The not sure. That's something you'd have to limit ask —  1 If you're not sure, that's your answer.  1 A No, sir.  2 A Of May would have been locked up in this place?  3 A Ok Sa seized property often locked up in this place?  4 A Cover that I would hink so, yea, sir.  4 A No, sir.  4 A R. LANXIEF:  5 A That's something you'd have to look a will be place?  5 A It was locked up.  6 A No, sir.  6 A No, sir.  7 O Whore was seized property usually kept?  8 A It was locked up.  9 Q Where does it get locked up at?  10 A Ten not sure. That's something you'd have to look a will be place?  10 A Ten not sure. That's something you'd have to look a will be place?  11 A No, sir.  12 A No, sir.  13 A No, sir.  14 O Where was seized property usually kept?  15 A No, sir.  16 A No, sir.  17 O Whore was seized property as a newer.  18 A Weld him have been locked	10	Q	So, it would go to an attorney. How did you	10	Α	Yes, because his name is on the Writ.
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17 A Yes, sir. 18 Q But you said earlier you don't remember if you 19 knew who Mr. Shelton was prior to June 12th. 20 MS. JONES: 21 Object to the form. 22 MR. LANNEEY: 23 Is there a question pending? 24 Q You did not know prior to June 12, 2018 who Mr. 25 Shelton was? 26 Would you have access to the physical note at 27 A Of July what point at 28 Q Of July 5, 2018. 29 A Of July what point at 3 Q Of July 5, 2018. 30 A Would I have access to it? 40 Who would you know it was locked up I suppose is 41 What I'm asking? 42 A No. sir. No, sir. 43 A I'w as locked up. 44 A I'w not sure. That's something you'd have to 11 ask 12 MR. LANKIEY: 13 If you're not sure, that's your answer. 14 Q Where was seized property usually kept? 15 A We didn't lock up seized property usually kept? 16 A No, sir. 17 Q Where was seized property usually kept? 18 A We didn't lock up seized property usually kept? 19 Q Where was seized property usually kept? 10 A Wen would have had it? 21 MR. LANKIEY: 22 MR. LANKIEY: 23 MR. LANKIEY: 24 MR. LANKIEY: 25 Correct. 26 Whoet one seized property usually kept? 27 MR. LANKIEY: 28 MR. LANKIEY: 29 MR. LANKIEY: 20 Q One nothing less would have been locked up. 20 Uhere was seized property usually kept? 21 The not sure. That's something to the promissory note, who is the "we' there? 26 Who you said that we have received the original promissory note, who is the "we' there? 29 A Civil Department or Sheriff's Office? 20 Would you have access to the physical note at  48  48  48 Would not know prior to June 12, 2018 who Mr. 49  40 Would you have access to the physical note at  40 No. sir. No. sir. 40 No hor not that I would know of. 41 What is "twas locked up is suppose is what I'w asking? 41 What is "this "to mething the would have been locked up in this in the would you know it was locked up. 40 Who would you know it was locked up in this in the promissory note, who is the "we' there? 41 Who not of the would have been locked up in this in the would know of. 42 Who would you have access to the phy						
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25 A No, sir.   25 MR. MARTIN:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A	this point?  Of July what point at Of July 5, 2018.  Would I have access to it?  Was it at your desk, for instance?  No, sir. No, sir.  Who would have had it?  It was locked up.  Where does it get locked up at?  I'm not sure. That's something you'd have to ask  MR. LANGLEY:  If you're not sure, that's your answer.  Was seized property often locked up in this place?  No, sir.  Where was seized property usually kept?  We didn't lock up seized property. This promissory note was locked up.  So, nothing else would have been locked up at the same location?  MR. LANGLEY:  Objection to the form of the question.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q	Nothing else would have been locked up?  I do not not that I would know of.  How would you know it was locked up I suppose is what I'm asking?  Upon receipt, consulting with Jean Horne and James Sutherland, it was advised that we had to have that locked up.  But you didn't know where?  No, sir. I was not in charge of that.  And when you say locked up, it suggests to me through some sort of safe?  I would think so, yes, sir.  But this is a form letter and you kind of filled it in?  Correct.  To your knowledge from what you remember, is this your first communication to Mr. Shelton?  I don't know. I don't know who Mr. Shelton is so I don't know if I've ever talked to him in my life before.  Other than this?  I  MR. LANGLEY:
1	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A	this point?  Of July what point at Of July 5, 2018.  Would I have access to it?  Was it at your desk, for instance?  No, sir. No, sir.  Who would have had it?  It was locked up.  Where does it get locked up at?  I'm not sure. That's something you'd have to ask  MR. LANGLEY:  If you're not sure, that's your answer.  Was seized property often locked up in this place?  No, sir.  Where was seized property usually kept?  We didn't lock up seized property. This promissory note was locked up.  So, nothing else would have been locked up at the same location?  MR. LANGLEY:  Objection to the form of the question.  You can answer if you have an answer.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A Q	Nothing else would have been locked up?  I do not not that I would know of.  How would you know it was locked up I suppose is what I'm asking?  Upon receipt, consulting with Jean Horne and James Sutherland, it was advised that we had to have that locked up.  But you didn't know where?  No, sir. I was not in charge of that.  And when you say locked up, it suggests to me through some sort of safe?  I would think so, yes, sir.  But this is a form letter and you kind of filled it in?  Correct.  To your knowledge from what you remember, is this your first communication to Mr. Shelton?  I don't know. I don't know who Mr. Shelton is so I don't know if I've ever talked to him in my life before.  Other than this?  I  MR. LANGLEY:  What is "this"?

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		49			50
1		I'm sorry, good point.	1	Q	Okay. But you do not recall receiving this
2	Q	I was holding up Exhibit #7. Other than this	2	~	letter?
3	~	communication to Mr. Shelton, you don't know if	3	А	Correct.
4		you've communicated with Mr. Shelton?	4	Q	There's handwriting on this letter. Do you know
5	А	Correct. I don't know.	5	~	if that's your handwriting?
6		MR. LANGLEY:	6	A	No, sir, that's not mine.
7		I'm going to object to the form of the	7	0	There's something scratched out. The original
8		question.	8	~	note is described as follows and there's a wavy
9	Q	Okay. I'm going to hand you a document I	9		line through it. Do you remember if you
10	~	think we're at #8 Exhibit #8. This is a	10		scratched that out?
11		letter. Do you recognize this document?	11	А	No, sir.
12	A	I don't remember seeing, but I don't	12	0	On the second page it says, "The promissory note
13		remember, but yes, this does have my name on it.	13	×	is movable property, therefore it is only
14	0	Okay. And this says, "Dear Kim, enclosed please	14		necessary for it to be advertised once for
15	×	find our check in the amount of Fifteen Hundred	15		sale." We talked earlier about the
16		(1500.00) payable to the Order of the Bossier	16		movable/immovable distinction. Did attorneys
17		Sheriff's Office." This would seem to be a	17		often tell you whether a piece of property was
18		response to your July 5th letter; is that	18		movable or immovable?
19		correct, asking for a deposit?	19	А	No.
20		MR. LANGLEY:	20	0	How would you usually then make that
21		Object to the form of the question.	21	×	determination?
22		You can answer if you know it.	22	A	It should state it on the wherever the
23	A	I don't know.	23	11	Writ the description on the Writ.
24	0	Who does it say it's from?	24	0	Do you recall if the Writ in this case had an
25	A	It says it's from Curtis R. Shelton.	25	×	identification?
1					
		51			52
1	A	51 No, sir.	1		52 times something needed to be advertised?
1 2	A O	No, sir.	1 2	A	times something needed to be advertised?
		No, sir. Okay. So, an attorney telling you that it is	1	A O	times something needed to be advertised?
2		No, sir.	2		times something needed to be advertised?
2 3		No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:	2 3		times something needed to be advertised?  No.  So, it was unusual to receive an instruction?  MR. LANGLEY:
2 3 4		No, sir. Okay. So, an attorney telling you that it is movable property would be abnormal to you?	2 3 4		times something needed to be advertised?  No.  So, it was unusual to receive an instruction?  MR. LANGLEY:  Object to the form of the question.
2 3 4 5		No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:  Object to the form.  MR. LANGLEY:	2 3 4 5		No. So, it was unusual to receive an instruction? MR. LANGLEY: Object to the form of the question. You can answer it if you have an answer.
2 3 4 5 6 7	Q	No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:  Object to the form.  MR. LANGLEY:  Object to the form of the question.	2 3 4 5 6 7	Q A	times something needed to be advertised?  No.  So, it was unusual to receive an instruction?  MR. LANGLEY:  Object to the form of the question.  You can answer it if you have an answer.  I wouldn't say anything was unusual.
2 3 4 5 6		No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:  Object to the form.  MR. LANGLEY:  Object to the form of the question.  I would say no.	2 3 4 5 6	Q	No. So, it was unusual to receive an instruction? MR. LANGLEY: Object to the form of the question. You can answer it if you have an answer.
2 3 4 5 6 7 8	Q	No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:  Object to the form.  MR. LANGLEY:  Object to the form of the question.  I would say no.  It's not abnormal, but you said a minute ago	2 3 4 5 6 7 8 9	Q A	times something needed to be advertised?  No.  So, it was unusual to receive an instruction?  MR. LANGLEY:  Object to the form of the question.  You can answer it if you have an answer.  I wouldn't say anything was unusual.  So, it did not usually happen, but you would not
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A	No, sir.  Okay. So, an attorney telling you that it is movable property would be abnormal to you?  MS. JONES:  Object to the form.  MR. LANGLEY:  Object to the form of the question.  I would say no.  It's not abnormal, but you said a minute ago that they did not usually do that.  Occasionally we get things from people that have a lot of information that I don't need or do need. I don't ask them for that.  The following sentence says, "Therefore it is only necessary for it to be advertised once for sale." Would attorneys often tell you how many times something needed to be advertised?  MS. JONES:  Object to the form.  I would say no.  That would be unusual?  MS. JONES:  Object to the form.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A	No.  So, it was unusual to receive an instruction?  MR. LANGLEY:  Object to the form of the question.  You can answer it if you have an answer.  I wouldn't say anything was unusual.  So, it did not usually happen, but you would not characterize it as unusual?  MR. LANGLEY:  Object to the form of the question.  I'm not trying to play gotcha here. I just want to understand your distinction between that doesn't usually happen and it's not unusual.  I wouldn't rule out anything as unusual because occasionally you get letters that may have incorrect information or may have extra information that you didn't ask for, so it's not a  Do you recall if you asked for this information?  No, sir.  In most cases were you're dealing with a sale, did you receive instructions from an attorney?

		53			54
1		You can answer it if you have an answer.	1	A	I would have checked with Jean Horne who
2	A	We receive a lot of things. I don't know if you	2	Q	Okay.
3		could call them instructions. I'd say no.	3	A	would have had to check with Mr. Sutherland.
4	Q	Okay. Do you recall whether you went to Jean	4	Q	But you do not recall in this case whether that
5		Horne about the issue of whether this was	5		happened?
6		immovable property or not?	6	A	I do not recall that specifically, no.
7	Α	No.	7	Q	Okay. This letter was in September of 2018.
8	Q	No, you do not recall?	8		That's a few months after previous document I
9	Α	No, I do not. Correct.	9		showed you from July. Do you know if anything
10	Q	Do you recall if you went to Mr. Sutherland	10		was going on let me go back. Between July 5,
11		about the issue of whether this was movable	11		2018 and September 5, 2018, do you recall if you
12		property?	12		took any action regarding this case?
13	Α	About specifically movable? No, sir. I do not	13	A	No, sir. I do not.
14		recall.	14	Q	If you had taken any action, do you think you'd
15	Q	Do you recall asking anyone else about whether	15		have documents showing what you did?
16		it was necessary for it to be advertised once	16	A	Yes, sir.
17		for sale?	17	Q	What kind of documents would you have?
18	Α	No, sir.	18		MR. LANGLEY:
19	Q	Do you recall if after this when you did	19		Object to the form of the question.
20		advertise it for sale if you relied solely on	20		You can answer it if you have an answer.
21		this statement?	21	A	Anything we have letters or e-mails would
22	Α	No, sir. I did not rely on this, no, sir.	22		be in the file.
23	Q	In determining how many times you'd advertise	23	Q	So, it would consist of letters or e-mails if
24		the property, what would you have relied on	24		you took any actions?
25		other than this?	25	A	Correct.
		55			56
1	Q	55 Okay. I'm going to go to I'm going to mark	1		56 I'm sorry. I said we didn't deal with
1 2	Q				
	Q	Okay. I'm going to go to I'm going to mark	1	Q	I'm sorry. I said we didn't deal with anyone specific.
2	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.	1 2	Q	I'm sorry. I said we didn't deal with
2 3	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9. MS. JONES:	1 2 3	Q A	I'm sorry. I said we didn't deal with anyone specific. So, when you said dear clerk it's just sort of
2 3 4	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?	1 2 3 4	~	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department?
2 3 4 5	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:	1 2 3 4 5	A	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department?  (Witness nods head.)
2 3 4 5 6	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:	1 2 3 4 5 6	A	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department?  (Witness nods head.)  Okay. I'm sorry, this is to the Caddo Parish
2 3 4 5 6 7 8	~	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:  Okay.	1 2 3 4 5 6 7	A	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department? (Witness nods head.)  Okay. I'm sorry, this is to the Caddo Parish Sheriff's Office.  MR. LANGLEY:
2 3 4 5 6 7 8 9	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:  Okay.  Is this a letter from you to the Civil	1 2 3 4 5 6 7 8 9	A	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department?  (Witness nods head.)  Okay. I'm sorry, this is to the Caddo Parish Sheriff's Office.
2 3 4 5 6 7 8 9	~	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:  Okay.	1 2 3 4 5 6 7 8 9	A Q	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department? (Witness nods head.) Okay. I'm sorry, this is to the Caddo Parish Sheriff's Office.  MR. LANGLEY:  Thank you, Counsel.  You do not remember who the Caddo clerk was at
2 3 4 5 6 7 8 9 10	Q	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:  Okay.  Is this a letter from you to the Civil  Department of the sheriff's office?	1 2 3 4 5 6 7 8 9 10	A Q	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department? (Witness nods head.) Okay. I'm sorry, this is to the Caddo Parish Sheriff's Office.  MR. LANGLEY:  Thank you, Counsel. You do not remember who the Caddo clerk was at that time? This was just to the office. And it
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2 3 4 5 6 7 8 9 10 11 12 13	Q A	Okay. I'm going to go to I'm going to mark this as #9 Exhibit #9.  MS. JONES:  Is that the September 6th letter?  MR. MARTIN:  Yes.  MS. JONES:  Okay.  Is this a letter from you to the Civil Department of the sheriff's office?  Yes.  MR. LANGLEY:  I object to the form of the question.	1 2 3 4 5 6 7 8 9 10 11 12 13	A Q	I'm sorry. I said we didn't deal with anyone specific.  So, when you said dear clerk it's just sort of the whole department? (Witness nods head.) Okay. I'm sorry, this is to the Caddo Parish Sheriff's Office.  MR. LANGLEY:  Thank you, Counsel.  You do not remember who the Caddo clerk was at that time? This was just to the office. And it says, "In order to expedite the date of sale per the attorney, please mail the returns in a self-
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		57			,	58
1	Q	So, do you think this is a cover letter?	1		with.	-
2	А	I don't know that.	2	Q	And what made a certain material time sensitive?	)
3	Q	It says, "Ray, service for Barbara Marie Carey	3	A	Things would have to be served before you could	
4	~	Carr Lollar". Do you remember if this is about	4		advertise. It was kind of a schedule you would	
5		serving Ms. Lollar with a document?	5		follow I quess according to the Louisiana law.	
6	A	I don't remember. I'm sorry.	6		I'm not	
7	Q	Okay. It says, "In order to expedite the date	7	Q	Okay.	
8	~	of sale per the attorney, please mail the	8	~ A	sure how things had to be advertised and so	
9		returns". Do you recall why you said in order	9		forth.	
10		to expedite the date of sale per the attorney?	10	0	Was your understanding that some things were	
11	А	No, sir.	11	×	more time sensitive than others under the law?	
12	0	Did you often at this time ask for expedited	12		MR. LANGLEY:	
13	Q	sales?	13		I object to the form of the question.	
14		MS. JONES:	14		You can answer it if you have an answer.	
15			15	7\	I don't know how to I don't	
1		Object to the form of the question.		A		
16		MR. LANGLEY:	16	Q	Because it says per the attorney. You don't	
17	_	Join the objection.	17		think that's a request to expedite it from an	
18	A	No, sir.	18		attorney?	
19	Q	You did not often do that?	19		MS. JONES:	
20		MS. JONES:	20		Object to the form.	
21		Same objection.	21	A	I can't say. I don't I don't know why it's	
22		MR. LANGLEY:	22		in there.	
23		Same objection.	23	Q	Do you recall any other instances where you did	
24	Q	Just	24		expedite a sale upon an attorney's request?	
25	Α	It's just time sensitive material that you deal	25	Α	No. We never expedited sales.	
1	0	This would be unusual though?	1	Δ		60
1 2	Q	This would be unusual, though?	1 2	A	Correct.	60
2	Q	This would be unusual, though? MS. JONES:	2	A Q	Correct.  Do you make that distinction when you're or	60
2 3	~	This would be unusual, though?  MS. JONES:  I'm going to object to the form.	2 3		Correct.  Do you make that distinction when you're or did you make that sort of distinction when you	60
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		61			62
1		MR. MARTIN:	1		He doesn't instruct on the basis of
2		I	2		harassment or protection under Rule 26b.
3		MR. LANGLEY:	3		MR. LANGLEY:
4		She can tell you what she did and	4		So
5		you've already asked her if she did favors	5		MR. MARTIN:
6		and she's answered that question.	6		If that's what you're doing, please
7		MR. MARTIN:	7		state it on the record. I'd like to know.
8		I don't think you can caution the	8		MR. LANGLEY:
9		witness on how to answer unless you're	9		I'm instructing her not to answer the
10		telling her not to answer privileged.	10		question. I think this equine is deceased.
11		MR. LANGLEY:	11		MR. MARTIN:
12		Don't answer.	12		I don't think it is.
13		MR. MARTIN:	13		MR. LANGLEY:
14		Are you invoking privilege?	14		Okay. Then proceed at your peril.
15		MR. LANGLEY:	15		MR. MARTIN:
16		I think it's an improper question. I	16		Okay.
17		think you can this is a fact deposition.	17	MR.	MARTIN, CONTINUING:
18		You can ask her what she knows.	18	0	You went by what the said?
19		MR. MARTIN:	19	A	Correct.
20		Sure, and you can object in two ways,	20	0	Not by what attorneys said. And so if an
21		on privilege or a form objection.	21	-	attorney had asked you to do something, what
22		MR. LANGLEY:	22		would you have done?
23		Thank you, Counsel. I appreciate the	23	A	Nothing.
24		instruction.	24	Q	Okay. I'm going to hand you what I'm labeling
25		MS. JONES:	25		Exhibit #10, okay? Is this an e-mail from you
		63			64
1	_	to curtisshelton@arklatexlaw.com?	1		Caddo Parish I will contact you immediately to
2	A	to curtisshelton@arklatexlaw.com? Correct.	2		Caddo Parish I will contact you immediately to send you an ad approval. Once approved we will
2 3	Q	to curtisshelton@arklatexlaw.com? Correct. Do you remember sending this e-mail?	2 3		Caddo Parish I will contact you immediately to send you an ad approval. Once approved we will set for sale as I understand this a time-
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2 3 4 5	Q	to curtisshelton@arklatexlaw.com? Correct.  Do you remember sending this e-mail?  No, sir.  Okay. It says it's September 6, 2018. Would	2 3 4 5		Caddo Parish I will contact you immediately to send you an ad approval. Once approved we will set for sale as I understand this a time- sensitive matter." Now, when we discussed Exhibit #9 you said that expedited sales were
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		65			66
1		receive your approval, I will be sending a	1	Q	Do you know anything about the suit now?
2		notice of seizure and notice to appoint	2	A	No.
3		appraiser to Barbara Marie Carey Carter Lollar."	3	Q	Okay. You knew there was a case number?
4		Am I to understand that your approval means your	4	A	Correct.
5		approval for the verbiage?	5	Q	1-2-7-5-7-3.
6	A	I don't recall. I can't answer.	6	A	Yes.
7	Q	Okay.	7	Q	And that was directed to you because it ended in
8	A	I'm sorry.	8		an odd number?
9	Q	Now, if I've asked you this already you can tell	9	A	Correct.
10		me, but I believe you said earlier you were not	10	Q	But you never looked into what the suit was
11		aware of the underlying litigation that led to	11		about?
12		the judgment culminating in the Writ, Lucky V.	12	A	I guess within the scope of our job.
13		Carr, Case #127573?	13		MR. LANGLEY:
14		MR. LANGLEY:	14		It's a yes-or-no question.
15		Objection to the form of the question.	15	Α	No.
16		That wasn't exactly what you asked her, but	16	Q	You're allowed to say as much as you want.
17			17		Within the scope of your job you were starting
18		MR. MARTIN:	18		to say within the scope of your job, did you
19		Sure.	19		have to know something about the suit?
20	A	Are you asking if I know how this suit	20	Α	I guess I'm just confused what
21		originated, I guess?	21	Q	Sure.
22	Q	Sure. Did you know anything about that suit?	22	A	If I don't know like what led up to it or
23	A	No, sir.	23		what I'm not
24	Q	No?	24	Q	Do you know who Lucky is in Lucky V. Carr?
25	Α	No.	25	Α	No.
		67			68
1	Q	Do you know who Carr is in Lucky V. Carr?	1		September of 2018?
2	A	Do you know who Carr is in Lucky V. Carr? No. I know none of them, I'm sorry.	1 2	А	September of 2018? (Witness shakes head.)
2 3		Do you know who Carr is in Lucky V. Carr?  No. I know none of them, I'm sorry.  Then it goes without saying you never looked at	1 2 3	Q	September of 2018? (Witness shakes head.) Okay. Do you know what a civil appeal is?
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		69			70
1		It's #12.	1	Q	At the bottom it says, "This matter is
2	Q	Exhibit #12.	2		tentatively scheduled for sheriff's sale on the
3		MR. LANGLEY:	3		first Wednesday, 14 days from the date of the
4		You want to re-mark that, Counsel, to	4		Notice of Seizure. However, you should contact
5		your exhibit?	5		the sheriff's office at 318-965-3404 for the
6		MR. MARTIN:	6		actual sale date and any rescheduling." Was
7		My apologies.	7		this form language?
8	Q	Do you recognize this one?	8	A	Yes, correct.
9	Α	I recognize it's a Notice of Seizure.	9	Q	Who handled the scheduling of the sheriff's sale
10	Q	Okay. Is that your signature at the bottom?	10		in the office?
11	A	Yes.	11	A	I believe that was set by log which days that
12	Q	Did you often sign these notices of seizure?	12		they every Wednesday.
13	А	Yes, sir.	13	Q	Okay.
14	Q	Okay. And what was the role of a Notice of	14	A	Excluding holidays.
15	-	Seizure in your understanding?	15	0	I've never been very good at math. This date is
16	А	This was notice I guess as it states. It was a	16	~	September 6, 2018, fourteen days from the date
17		Notice of Seizure being sent to the parties	17		of the Notice of the Seizure would be September
18		involved.	18		20, 2018? So, that would generally be the date
19	0	Which party does it look like this one is to?	19		or the first Wednesday after that date?
20	A	This one is to Barbara Lollar, to her attorney,	20	А	That actually though does not include
21	А	Jay Davis Powell.	21	А	advertising and such. That's just formal
22	0	Okay. And you say it's a Notice of Seizure. It	22		wording because I believe by law you would have
23	Q		23		
1		tells someone that a piece of property has been			to have the seizure served, then you would have
24	-	seized?	24	0	to have the advertising
25	A	Correct.	25	Q	Okay.
1	7\	71	1	0	And would you be the person who calculates that
1	A	so all that's dependent upon	1	Q	And would you be the person who calculates that
2	A Q	so all that's dependent upon So, the actual date would generally not be	2	Q	And would you be the person who calculates that date for the purposes of the advertisement?
2		so all that's dependent upon So, the actual date would generally not be what's listed in that form language because of	2 3	Q	And would you be the person who calculates that date for the purposes of the advertisement?  Would you have to put that in when you request
2 3 4	Q	so all that's dependent upon So, the actual date would generally not be what's listed in that form language because of the aforementioned advertisements?	2 3 4	~	And would you be the person who calculates that date for the purposes of the advertisement? Would you have to put that in when you request the advertisement?
2 3 4 5	Q A	so all that's dependent upon So, the actual date would generally not be what's listed in that form language because of the aforementioned advertisements? Correct.	2 3 4 5	A	And would you be the person who calculates that date for the purposes of the advertisement?  Would you have to put that in when you request the advertisement?  The date of sale? Yes, correct.
2 3 4 5 6	Q	so all that's dependent upon So, the actual date would generally not be what's listed in that form language because of the aforementioned advertisements? Correct. Yeah. So, who would provide the notice of the	2 3 4 5 6	~	And would you be the person who calculates that date for the purposes of the advertisement?  Would you have to put that in when you request the advertisement?  The date of sale? Yes, correct.  Who would you go to for the advertisement? Does
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q Q	so all that's dependent upon So, the actual date would generally not be what's listed in that form language because of the aforementioned advertisements? Correct. Yeah. So, who would provide the notice of the actual sales date? Once everything was completed there was according to whichever Wednesday, if it was a movable or non-movable, once everything was completed there was just date look on the calendar for which available Wednesday Who would look on the calendar? Whomever's suit or file it was. Would that be you in this case? Yes. Okay. So, would you then tell everyone the actual date after that point? I believe that's how you would select the advertising dates and then the advertisement itself, it would have the actual date of the sale, so depending on whenever it was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q	And would you be the person who calculates that date for the purposes of the advertisement?  Would you have to put that in when you request the advertisement?  The date of sale? Yes, correct.  Who would you go to for the advertisement? Does it have to be a newspaper?  Bossier Press-Tribune, perhaps? I can't Okay.  remember the exact But that was a newspaper?  I believe that was Okay. You did that because Ms. Pat Taylor trained you to contact the Bossier Newspaper?  Yes, sir.  Okay. Exhibit #13 I'm handing you. Exhibit #13 is this an e-mail from you to Mr. curtisshelton@arklatexlaw.com?  Correct.  The second page of it says, "Mr. Shelton, please see attached advertisement notice for your review. After reviewing if all information is

1 A I just I can't remember if this was 2 honestly I cannot remember. 3 Q Okay. Would you send advertisements out for 4 approval? 5 A Yes, correct. 6 Q To whom? 7 A I don't know what I don't know how to I 8 can't okay. It's whoever was on the Writ, 9 I'm sorry 10 Q Okay. 10 A I don't recall doing it, but my signature 11 A is what 12 Q Yeah, that's fine. 13 A that's for. 14 Q And you've previously at this point had e-mail 15 exchanges with Mr. Shelton as we've discussed; 16 A They were sent to the sheriff's office.	nks nne.
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3 Q Okay. Would you send advertisements out for 4 approval? 5 A Yes, correct. 6 Q To whom? 7 A I don't know what I don't know how to I 8 can't okay. It's whoever was on the Writ, 9 I'm sorry 10 Q Okay. 10 A I don't recall doing it, but my signature 11 A is what 12 Q Yeah, that's fine. 12 Q Yeah, that's for. 14 Q And you've previously at this point had e-mail 15 exchanges with Mr. Shelton as we've discussed; 15 Curtis Shelton's signature? 4 A Yes. 5 Q Okay. I'm going to hand you #15. This lo 6 like the ad in question? 7 A Correct. 8 Q And an invoice from the Bossier Press-Trib 9 Do you recall looking at this advertisemen 10 I it, so 11 it, so 12 Q That's your handwriting right there? 13 A Yes. 14 Q Okay. And would the Bossier Press-Tribune 15 typically send you invoices? Do you remem	nks nne.
4 A Yes.  5 A Yes, correct.  6 Q To whom?  7 A I don't know what I don't know how to I  8 can't okay. It's whoever was on the Writ,  9 I'm sorry  10 Q Okay.  11 A is what  12 Q Yeah, that's fine.  13 A that's for.  14 A Yes.  5 Q Okay. I'm going to hand you #15. This logh like the ad in question?  7 A Correct.  8 Q And an invoice from the Bossier Press-Trib  9 Do you recall looking at this advertisement  10 A I don't recall doing it, but my signature  11 it, so  12 Q That's your handwriting right there?  13 A Yes.  14 Q And you've previously at this point had e-mail exchanges with Mr. Shelton as we've discussed;  15 typically send you invoices? Do you remem	me.
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13 A that's for.  14 Q And you've previously at this point had e-mail  15 exchanges with Mr. Shelton as we've discussed;  13 A Yes.  14 Q Okay. And would the Bossier Press-Tribune  15 typically send you invoices? Do you remem	
14 Q And you've previously at this point had e-mail 14 Q Okay. And would the Bossier Press-Tribune 15 exchanges with Mr. Shelton as we've discussed; 15 typically send you invoices? Do you remem	
15 exchanges with Mr. Shelton as we've discussed; 15 typically send you invoices? Do you remem	
16 correct?   16 A They were sent to the sheriff's office.	er?
17 A Correct. 17 Q Okay. You don't know if you received this	
18 Q And this is September 14, 2018; correct? 18 particular one?	
19 A (Witness nods head.)  19 A No, sir. I didn't check the mail.	
20 Q Okay. I'm going to hand you Exhibit #14. Is 20 Q Okay. So, that was September 14th.	
21 this another e-mail exchange between you and Mr. 21 MR. LANGLEY:	
22 Shelton related to the advertisement form? 22 What was September 14th?	
23 A Yes. 23 MR. MARTIN:	. ,
24 Q The second page appears to have a signature from 24 Exhibit #15, and the invoice	. ' M
25 an attorney for plaintiff on it? 25 wrong.	
75 1 MR. LANGLEY: 1 those are the people I would have consulte	<b>76</b> I with
2 Okay. 2 during the entire	
3 MR. MARTIN: 3 Q Okay.	
4 It's my fault. Go back. 4 A suit itself.	
5 Q The e-mail exchange between you and Mr. Shelton 5 Q And you said earlier when were discussing	
6 I have marked Exhibit #15 is September 14, 2018? 6 generally appraisers that you thought if t	10
7 A That's correct. 7 appraisals were more than ten percent (10%	
8 Q Okay. Based on what you've seen today, is it 8 apart you needed a third appraiser. Do yo	l
9 correct to say you've you were on this file 9 recall by mid September of this year, 2018	that
	7
from July 5, 2018 to September 14, 2018? That 10 there was anything that made a third appra	.sal
from July 5, 2018 to September 14, 2018? That 10 there was anything that made a third appra 11 was just your file at that point? 11 likely in this case?	.sa1
	.sa1
11 was just your file at that point? 11 likely in this case?	.sa1
11 was just your file at that point? 11 likely in this case? 12 A I wouldn't restrict it to just my file. 12 A By what date, I'm sorry?	
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11 likely in this case? 12 A I wouldn't restrict it to just my file. 13 Q Okay. But it was partially your file? 14 A Correct. 15 Q Okay. Do you recall if prior to September 14th 16 you had gone to anybody else for advice about 17 this file? 18 A Other than my supervisor or James Sutherland or 18 Iikely in this case? 12 A By what date, I'm sorry? 13 Q September 14, 2018. 14 A I do not because I couldn't tell you when appraisals came in. 16 Q Yeah, okay. Would that generally be an aw for you then was when the appraisals came	he ard n?
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			1		
		77			78
1		MR. LANGLEY:	1		you and Mr. Shelton?
2		Objection. That's been asked and	2	A	Yes.
3		answered.	3	Q	Okay. And this is dated Monday, September 17,
4	A	If there was more than a ten percent (10%)	4		2018; is that correct?
5		difference?	5	A	Correct.
6	Q	Okay.	6	Q	Says, "Mr. Shelton, it is my understanding the
7	A	Is that	7		above-referenced suit is with appraisal in the
8	Q	So, before yeah.	8		event we have two appraisals that vary greatly
9	А	Okay.	9		and we have to get a third appraisal, do you
10	Q	If that's your answer.	10		have any recommendations as to whom appraises
11	А	Yeah.	11		these types of notes? If possible, could you
12	Q	There would be nothing before getting the	12		give the names of at least two so we're not down
13		appraisal	13		to the wire trying to find one last minute.
14	A	No, sir. No, sir. I'm sorry, I didn't	14		Thanks, Kim." Do you remember sending this e-
15	Q	Yeah. Nothing before getting the actual	15		mail?
16	~	appraisals that would make you think	16	А	I don't remember sending it.
17	А	Correct. Correct. I'm sorry.	17	0	Okay. Do you remember why you would have asked
18	0	Yeah, because you don't actually do the	18	~	for a recommendation?
19	~	appraisal?	19	A	This would be after consulting with James
20	А	Correct.	20		Sutherland. He would have advised.
21	0	You don't know how much a piece of property's	21	0	Why would you have consulted with Mr. Sutherland
22	×	going to be appraised for?	22	×	in the first place?
23	А	Correct.	23	A	This was a sale of promissory note and this was
24	0	Okay. I'm going to hand you Exhibit #16. Does	24		the first promissory so we would pretty much
25	×	this look like another e-mail exchange between	25		check with everything with him on that.
		79			80
1	Q	So, when you went to Mr. Sutherland it was for	1	Q	On page two, paragraph seven you say, "I was
2					
		every aspect of this procedure?	2		
3		every aspect of this procedure?  MR. LANGLEY:	3		instructed that if there was a great discrepancy between the two appraisals the sheriff would be
					instructed that if there was a great discrepancy
3	А	MR. LANGLEY: Objection.	3		instructed that if there was a great discrepancy between the two appraisals the sheriff would be
3 4	А	MR. LANGLEY:	3 4		instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's
3 4 5	A Q	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.	3 4 5		instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain
3 4 5 6		MR. LANGLEY: Objection. Not every aspect, just any question we might	3 4 5 6		instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did
3 4 5 6 7		MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third appraiser might be necessary?	3 4 5 6 7	A	instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement,
3 4 5 6 7 8 9	Q	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third	3 4 5 6 7 8		instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement, that you were instructed?
3 4 5 6 7 8	Q	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third appraiser might be necessary?  I'm not sure I would have asked him that. I'm not	3 4 5 6 7 8 9	A Q A	instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement, that you were instructed?  Is that
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3 4 5 6 7 8 9 10 11	Q A Q	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third appraiser might be necessary?  I'm not sure I would have asked him that. I'm not  Then you went to Mr. Sutherland before September 17, 2018?	3 4 5 6 7 8 9 10 11 12	Q A Q	instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement, that you were instructed?  Is that Yeah.  that's the Yeah.
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3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third appraiser might be necessary?  I'm not sure I would have asked him that. I'm not  Then you went to Mr. Sutherland before September 17, 2018?  Correct.  But you don't know the exact date you went to	3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q	instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement, that you were instructed?  Is that Yeah.  that's the Yeah.  Yes, sir. Yeah. You swore
3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q	MR. LANGLEY: Objection.  Not every aspect, just any question we might have.  So, a question you might have is whether a third appraiser might be necessary?  I'm not sure I would have asked him that. I'm not  Then you went to Mr. Sutherland before September 17, 2018?  Correct.  But you don't know the exact date you went to Mr. Sutherland?  No, sir.	3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A	instructed that if there was a great discrepancy between the two appraisals the sheriff would be required to appoint a third appraiser and obtain a third appraisal in time for the sheriff's sale, which would only be five days later." Did you swear to the truthfulness of that statement, that you were instructed?  Is that Yeah.  that's the Yeah.  Yes, sir. Yeah.  You swore I'm sorry.
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1	Α	Uh-huh.	1	A	Yes, sir.
2	Q	So, it looks like you're saying you went to	2	Q	So, the order would be Mr. Sutherland has
3		Sutherland after you were instructed that if	3		instructed you that the sheriff would be
4		there was a great discrepancy.	4		required to appoint a third appraiser if there's
5	Α	No. Consulting with my supervisor, Jean Horne,	5		discrepancy
6		about any questions, then we would decide or	6	A	Correct.
7		not decide, but discuss whenever Mr. Sutherland	7	Q	for this sheriff's sale, which would only be
8		came in we would ask him about that.	8		five days after the so, Mr. Sutherland
9	Q	So when you say I was instructed, was that by	9		instructs you and then you go to Jean Horne and
10		Ms. Horne?	10		then you both consulted with Mr. Sutherland?
11	Α	By Mr. Sutherland.	11	Α	Regarding sheriff sales, yes.
12	Q	By Mr. Sutherland.	12	Q	So, the order is you talked to Sutherland, then
13	Α	He was the I guess the Civil because I don't	13		you talked to Horne and then y'all both talked
14		know anything about civil law.	14		to Sutherland?
15	Q	Yeah. So you were instructed if there's a great	15	А	I guess that's I'm not I'm not necessarily
16		discrepancy, so then you consulted with Jean	16		understanding because throughout the suit myself
17		Horne and then y'all went to back to	17		and Jean Horne would consult with Mr.
18		Sutherland if I'm reading seven and eight right?	18		Sutherland, so that specific are you asking
19	A	Okay. (Witness examines documents.) Okay.	19		if
20		Could you repeat that?	20	Q	Yeah. "I was instructed if there was a great
21	0	Yeah.	21	~	discrepancy"
22	~ A	Okay.	22	А	By Mr. Sutherland.
23	0	You said just now you said when I asked	23	Q	Yes.
24	~	who instructed you in paragraph seven you said	24	A	Yes, sir.
25		it was Mr. Sutherland.	25	0	And so then chronologically next and it says,
			1		
		83			84
1		83 "I then consulted with Jean Horne."	1		MR. LANGLEY:
1 2			1 2		
		"I then consulted with Jean Horne."			MR. LANGLEY:
2		"I then consulted with Jean Horne."  MR. LANGLEY:	2		MR. LANGLEY: not her testimony.
2		"I then consulted with Jean Horne."  MR. LANGLEY:  Object to the form of the question,	2 3	Q	MR. LANGLEY: not her testimony. MR. MARTIN:
2 3 4		"I then consulted with Jean Horne."  MR. LANGLEY:  Object to the form of the question,  Counsel. You left out a critical word in	2 3 4	Q	MR. LANGLEY:  not her testimony.  MR. MARTIN:  Okay.
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1		that he would look into the matter and see if	1		Sutherland, which resulted him saying I could
2		you could recommend the appropriate appraiser to	2		contact Curtis Shelton who he said he knew to be
3		appraise the subject promissory note should the	3		an experienced business attorney.
4		sheriff be required to appoint a third	4	А	Uh-huh.
5		appraiser." Paragraph ten, "Shortly after James	5	0	When James Sutherland mentions that
6		Sutherland contacted me and advised that after	6	Ā	Yes.
7		looking into the matter he was unable to locate	7	0	that had to be before September 17; right?
8		the appropriate appraiser to contact."	8	×	Because your request for the recommendation in
9		Paragraph eleven, "James Sutherland mentioned	9		this e-mail that you verified is yours is
10		that I could contact Curtis Shelton, who he said	10		September 17th.
					-
11 12		he knew to be an experienced business attorney	11 12		MR. LANGLEY:
		and asked him to provide recommendations."			Object to the form of the question.
13		Okay. This was your testimony in this	13	_	You can answer him if you know.
14	_	affidavit; correct?	14	A	I don't know how to answer that. I
15	A	That's correct.	15	Q	This may be a simpler way to do it. Would you
16	Q	Okay. All that occurred prior to September 17;	16		have asked for a recommendation for a third
17		correct?	17		appraiser from Mr. Shelton prior to Mr.
18	A	I don't know how to verify the timing.	18		Sutherland telling you to?
19	Q	Okay. Because you told me earlier that you did	19	A	No.
20		not reach out to Mr. Shelton asking for this	20	Q	So, that had to be before September 17th?
21		recommendation until you spoke to Mr.	21		MR. LANGLEY:
22		Sutherland.	22		Object to the form of the question.
23	Α	I guess could you rephrase are you asking if	23		You can answer him if you know.
24		I spoke to Mr. Shelton about	24	A	I don't know how to answer I mean, date,
25	Q	I'm saying your conversations with Mr.	25		time. I can't verify date. I don't
		87			88
1	Q	87 Can you verify that this e-mail says September	1	Q	88 Okay. Did you tell him that Mr. Shelton was
1 2	Q		1 2	Q	
	Q A	Can you verify that this e-mail says September		Q A	Okay. Did you tell him that Mr. Shelton was
2	~	Can you verify that this e-mail says September 17, 2018?	2	~	Okay. Did you tell him that Mr. Shelton was already involved in the case?
2 3	А	Can you verify that this e-mail says September 17, 2018? Yes. I can verify	2 3	A	Okay. Did you tell him that Mr. Shelton was already involved in the case? I don't know I would say no. I don't
2 3 4	A Q	Can you verify that this e-mail says September 17, 2018? Yes. I can verify Okay.	2 3 4	A Q	Okay. Did you tell him that Mr. Shelton was already involved in the case? I don't know I would say no. I don't Okay.
2 3 4 5	A Q A	Can you verify that this e-mail says September 17, 2018? Yes. I can verify Okay that's what that e-mail reads, yes.	2 3 4 5	A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case? I don't know I would say no. I don't Okay. He would have the Writ, so I don't know
2 3 4 5 6	A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.	2 3 4 5 6	A Q A Q	Okay. Did you tell him that Mr. Shelton was already involved in the case? I don't know I would say no. I don't Okay. He would have the Writ, so I don't know He would have the Writ
2 3 4 5 6 7	A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to	2 3 4 5 6 7	A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if
2 3 4 5 6 7 8	A Q A	Can you verify that this e-mail says September 17, 2018? Yes. I can verify Okay that's what that e-mail reads, yes. So, if that e-mail date is correct, then Mr. Sutherland saying to contact Mr. Shelton had to be before that day?	2 3 4 5 6 7 8	A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr.
2 3 4 5 6 7 8 9	A Q A	Can you verify that this e-mail says September 17, 2018? Yes. I can verify Okay that's what that e-mail reads, yes. So, if that e-mail date is correct, then Mr. Sutherland saying to contact Mr. Shelton had to be before that day? MR. LANGLEY:	2 3 4 5 6 7 8	A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?
2 3 4 5 6 7 8 9	A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY: Object to the form of the question.	2 3 4 5 6 7 8 9	A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I
2 3 4 5 6 7 8 9 10	A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.	2 3 4 5 6 7 8 9 10 11	A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have
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2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY: Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.	2 3 4 5 6 7 8 9 10 11 12	A Q A Q A Q	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?
2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't	2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't Okay. But you did say you wouldn't have got it you wouldn't have asked Mr. Shelton for recommendation?  Prior to Prior to Mr. Sutherland telling you to?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?  I just mentioned the Writ because you mentioned Okay.  the Writ.  MR. LANGLEY:  Your question is does she know how
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't Okay. But you did say you wouldn't have got it you wouldn't have asked Mr. Shelton for recommendation?  Prior to  Prior to Mr. Sutherland telling you to?  Correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?  I just mentioned the Writ because you mentioned Okay.  the Writ.  MR. LANGLEY:  Your question is does she know how Sutherland got the Writ?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't Okay. But you did say you wouldn't have got it you wouldn't have asked Mr. Shelton for recommendation?  Prior to  Prior to Mr. Sutherland telling you to?  Correct.  Okay. Do you remember going to Mr. Shelton? I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?  I just mentioned the Writ because you mentioned Okay.  the Writ.  MR. LANGLEY:  Your question is does she know how Sutherland got the Writ?  MR. MARTIN:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't Okay. But you did say you wouldn't have got it you wouldn't have asked Mr. Shelton for recommendation?  Prior to  Prior to Mr. Sutherland telling you to?  Correct.  Okay. Do you remember going to Mr. Shelton? I mean, I'm sorry, do you remember going to Mr.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?  I just mentioned the Writ because you mentioned Okay.  the Writ.  MR. LANGLEY:  Your question is does she know how Sutherland got the Writ?  MR. MARTIN:  She yeah. She said he would have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	Can you verify that this e-mail says September 17, 2018?  Yes. I can verify Okay.  that's what that e-mail reads, yes.  So, if that e-mail date is correct, then Mr.  Sutherland saying to contact Mr. Shelton had to be before that day?  MR. LANGLEY:  Object to the form of the question.  It's been asked and answered three times.  The witness doesn't know.  I just have no way to verify dates. I'm sorry.  Okay.  I don't Okay. But you did say you wouldn't have got it you wouldn't have asked Mr. Shelton for recommendation?  Prior to  Prior to Mr. Sutherland telling you to?  Correct.  Okay. Do you remember going to Mr. Shelton? I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	Okay. Did you tell him that Mr. Shelton was already involved in the case?  I don't know I would say no. I don't Okay.  He would have the Writ, so I don't know He would have the Writ I mean, if at that point? Would you have brought Mr. Sutherland the Writ?  He would have seen the Writ. I don't know if I would have brought it to him, but he would have seen the Writ.  How would he have seen it?  Talking about the Writ or the promissory note?  I just mentioned the Writ because you mentioned Okay.  the Writ.  MR. LANGLEY:  Your question is does she know how Sutherland got the Writ?  MR. MARTIN:

_			_		
		89			90
1		All right.	1		and instruct her not to answer any question
2	А	He would	2		that you don't know the answer to. I don't
3		MR. MARTIN:	3		want you to speculate. You can answer if
4		I said, how would he have had the Writ.	4		you know.
5	А	I'm sorry, he would have seen it?	5	0	And unfortunately I'm going to tell you, you're
6	Q	How would he have seen the Writ, yes.	6	~	going to have to answer my questions over the
7	Ã	He would have seen the the Writ itself. This	7		objections unless he invokes privilege.
8		is not the promissory note is what was locked	8		MR. LANGLEY:
9		up. The Writ itself a copy of the Writ would	9		I am instructing you not to answer the
10		always stay with the I would think would stay	10		question unless you know the answer to the
11		with the file. I don't	11		question. I don't want you to speculate.
12	Q	Okay. So, you brought him the whole file then?	12		MR. MARTIN:
13	~	MR. LANGLEY:	13		Do you want to take a break?
14		Objection, Counsel.	14		WITNESS:
15	А	Not all	15		Yes.
16	Q	Did you bring him the Writ?	16		MR. MARTIN:
17	Ã	I can't say I brought him the Writ. I just	17		I'm happy to give you a break.
18	Q	But you said he's seen the Writ?	18		WITNESS:
19	A	He would be able to answer that.	19		Is it okay to have one?
20	Q	I believe he's deceased.	20		MR. LANGLEY:
21		MR. LANGLEY:	21		Anytime you want one it's okay to have
22		Okay, this I object to the form of	22		one.
23		the question. I object to the line of	23		MR. MARTIN:
24		questions. Counsel, you asked questions in	24		I think there is
25		the conditional. I will caution the witness	25		WITNESS:
		91			92
1		91 I didn't know if there was a	1		92 Take your break. Come back when you're
1 2			1 2		
		I didn't know if there was a question MR. MARTIN:	2 3		Take your break. Come back when you're
2 3 4		I didn't know if there was a question MR. MARTIN: a pending question, but we can come	2 3 4		Take your break. Come back when you're ready.  (OFF RECORD.) MINATION BY MR. MARTIN, CONTINUING:
2 3 4 5		I didn't know if there was a question MR. MARTIN: a pending question, but we can come back to it.	2 3 4 5	Q	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING: Okay. Back to Exhibit #16.
2 3 4 5 6		I didn't know if there was a question MR. MARTIN: a pending question, but we can come back to it. MR. LANGLEY:	2 3 4 5 6	Q A	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING:  Okay. Back to Exhibit #16.  #16?
2 3 4 5 6 7		I didn't know if there was a question MR. MARTIN: a pending question, but we can come back to it. MR. LANGLEY: I'm sorry. What is the pending	2 3 4 5 6 7	Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING:  Okay. Back to Exhibit #16.  #16?  Yeah.
2 3 4 5 6 7 8		I didn't know if there was a question MR. MARTIN:     a pending question, but we can come back to it. MR. LANGLEY:     I'm sorry. What is the pending question just so I'm clear?	2 3 4 5 6 7 8	Q A Q A	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING:  Okay. Back to Exhibit #16.  #16?  Yeah. Okay.
2 3 4 5 6 7 8	Q	I didn't know if there was a question MR. MARTIN:     a pending question, but we can come back to it. MR. LANGLEY:     I'm sorry. What is the pending question just so I'm clear? The pending question is, you said Mr. Sutherland	2 3 4 5 6 7 8 9	Q A Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING: Okay. Back to Exhibit #16. #16? Yeah. Okay. The e-mail from September 17th.
2 3 4 5 6 7 8 9	Q	I didn't know if there was a question MR. MARTIN: a pending question, but we can come back to it. MR. LANGLEY: I'm sorry. What is the pending question just so I'm clear? The pending question is, you said Mr. Sutherland would have seen the Writ and I asked how would	2 3 4 5 6 7 8 9	Q A Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING: Okay. Back to Exhibit #16. #16? Yeah. Okay. The e-mail from September 17th. Okay.
2 3 4 5 6 7 8 9 10		I didn't know if there was a question MR. MARTIN: a pending question, but we can come back to it. MR. LANGLEY: I'm sorry. What is the pending question just so I'm clear? The pending question is, you said Mr. Sutherland would have seen the Writ and I asked how would Mr. Sutherland have seen the Writ?	2 3 4 5 6 7 8 9 10 11	Q A Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.)  MINATION BY MR. MARTIN, CONTINUING:  Okay. Back to Exhibit #16.  #16?  Yeah. Okay. The e-mail from September 17th. Okay. Not trying to do something you've already
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A	I didn't know if there was a question MR. MARTIN:  a pending question, but we can come back to it. MR. LANGLEY:  I'm sorry. What is the pending question just so I'm clear?  The pending question is, you said Mr. Sutherland would have seen the Writ and I asked how would Mr. Sutherland have seen the Writ? I don't know how he would have seen it. I don't Okay, so what before we go on break, then why do you say he would have? I don't I just I guess to be able to answer questions you'd have to have something to look at, so Okay. So you just inferred, is that correct, that he had seen it? I can't remember what he said. I don't know what he has seen or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.) MINATION BY MR. MARTIN, CONTINUING: Okay. Back to Exhibit #16. #16? Yeah. Okay. The e-mail from September 17th. Okay. Not trying to do something you've already answered. Tell me if I'm correct when I say you said you don't remember sending this particular e-mail? No, sir. Okay. And you don't know why you asked for the names of at least two so we're not down to the wire? No, sir. Okay. I'm going to hand you what I'm calling #18. Is this another e-mail exchange between you and Mr. Shelton?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A	I didn't know if there was a question MR. MARTIN:  a pending question, but we can come back to it. MR. LANGLEY:  I'm sorry. What is the pending question just so I'm clear?  The pending question is, you said Mr. Sutherland would have seen the Writ and I asked how would Mr. Sutherland have seen the Writ? I don't know how he would have seen it. I don't Okay, so what before we go on break, then why do you say he would have? I don't I just I guess to be able to answer questions you'd have to have something to look at, so Okay. So you just inferred, is that correct, that he had seen it? I can't remember what he said. I don't know what he has seen or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q	Take your break. Come back when you're ready.  (OFF RECORD.) MINATION BY MR. MARTIN, CONTINUING: Okay. Back to Exhibit #16. #16? Yeah. Okay. The e-mail from September 17th. Okay. Not trying to do something you've already answered. Tell me if I'm correct when I say you said you don't remember sending this particular e-mail? No, sir. Okay. And you don't know why you asked for the names of at least two so we're not down to the wire? No, sir. Okay. I'm going to hand you what I'm calling #18. Is this another e-mail exchange between you and Mr. Shelton?

		93			94
1	Q	Mr. Shelton said on September 21, 2018, which is	1	Q	You did not usually receive this sort of oath of
2		four days after the Exhibit #16 e-mail, "Dear	2		appraiser?
3		Kim, attached is the appointment of appraiser	3	Α	No. I don't think I've ever seen an oath of an
4		for the plaintiff, Mr. W.A. Lucky. He is	4		appraiser.
5		appointing Chad M. Garland. I would want to see	5	Q	Okay. The last page that's talking about
6		if I can find some other person to appraise the	6		appraisement sheet, do you recall looking at
7		note." Do you understand now that to be a	7		this on October 12, 2018?
8		response to your September 17th e-mail	8	А	No. I don't remember this.
9		requesting a recommendation?	9	Q	Okay. If you don't remember it, it's that's
10	A	Yes.	10		fine. But do you remember this appraisement
11	Q	Okay. I'm going to hand you #19. Do you recall	11		sheet form in general from your work from this
12		receiving this e-mail?	12		old department?
13	A	No, sir.	13	A	I'm not certain.
14	Q	Dated Friday, October 12, 2018. But it does	14	Q	Okay.
15		appear to be an e-mail from Mr. Shelton to you?	15	A	I know there was an appraisement sheet, but I'm
16	A	Yes.	16		not certain
17	Q	"Dear Kim, attached please find the executed	17	Q	Okay.
18		oath and appraisement sheet for the plaintiff's	18	A	what it looked like.
19		appraisal. Originals of the attached will be	19	Q	And it says on the body of the e-mail, "Attached
20		delivered to you today." Were you used to	20		please find the executed oath and appraisement
21		getting these oaths of appraiser? You can look	21		sheet from plaintiff's appraisal." Did you
22		at all the attachments if you want.	22		understand then why there would be a plaintiff's
23	A	(Witness examines documents.) No.	23	_	appraisal rather than anyone else's appraisal?
24	Q	You don't?	24	A	I don't know why they
25	Α	I don't, no.	25	Q	Okay.
		95			96
1	A	worded it that way.	1	Q	Let's go to #20 now. I'm going to hand you what
2	Q	Do you know what the term "plaintiff" means?	2		I'm labeling #20. This appears to be an e-mail
3	Α	Plaintiff and I mean, yes, sir.	3		from Mr. Shelton to you, one that's dated
4	Q	In a lawsuit?	4		October 12, 2018.
5	Α	Uh-huh. Yes, sir.	5	A	Okay.
6	Q	Did you understand from this then that Mr.	6	Q	Do you remember receiving this e-mail?
7		Shelton represented the plaintiff?	7	A	No, sir.
8	Α	Yes.	8	Q	It says, "Dear Kim, in the event a third
9	Q	Okay. If you go back to #18, I just want you to	9		appraisal is needed, I have located a person,
10		look at the dates on #18 and #19. Your e-mail	10		Mr. Patrick Lacour, who can appraise for the
11		exchange that's Exhibit #18 ends with an e-mail	11		sheriff. He's an accountant who also a CVA
12		from you to Mr. Shelton, Friday, September 21,	12		designation, which is Certified Valuation
13		2018 at 9:26 a.m.; is that right?	13		Analyst designation from NACVA, National
14	Α	Yes.	14		Association of Certified Valuators and
15	Q	And then Exhibit #19, the e-mail from Mr.	15		Analysts." Skip down. "I'm also attaching a
16		Shelton is Friday, October 12, 2018.	16		copy of Mr. Lacour's CV. I have provided Mr.
17	Α	Correct.	17		Lacour information about the note and he has
18	Q	Do you recall any other e-mail exchanges between	18		told me that he is willing to be an appraiser
19		yourself and Mr. Shelton during that period	19		for the sheriff if he is appointed. Mr. Lacour
20		between September 21st and October 12th?	20		understands that he would be appraising for the
21	Α	No, sir.	21		sheriff and not for either party." Now, you've
22	Q	Okay. Do you remember doing anything on this	22		said you don't remember receiving this?
23		case file between September 21st and October 12,	23	A	No.
24		2018?	24	Q	Okay. I don't want to assume, but I think that
25	Α	No, sir.	25		means you don't recall reading I have provided
			1		

			1		
		97			98
1		Mr. Lacour information about the note?	1	Q	Okay.
2	Α	I don't yeah, I don't remember	2	Α	Just with the description of the property.
3	Q	Okay.	3	Q	You don't recall another instance of an attorney
4	Α	this e-mail.	4		providing information about property, correct?
5	Q	Sitting here today thinking back to your time in	5	A	I don't know if they I wouldn't know what
6		civil department, can you think of other	6		they would do, but no.
7		instances where attorneys would have provided	7	Q	Do you recall that if by October 12, 2018 you
8		information about property to a potential third	8		sent the information you just referenced?
9		appraiser?	9	A	If I sent it to?
10	A	I do not know.	10	Q	A third appraiser?
11	Q	Did you provide information to third appraisers	11	A	I do not.
12		when third appraisals were required?	12	Q	To your knowledge sitting here today was a third
13	Α	If a third appraisal was required, whatever was	13		appraisal required on October 12, 2018?
14		provided was on the appraisal sheet, which I	14	A	I'm not sure where October 12th was in the
15		don't remember the information on there.	15	Q	Okay.
16	Q	Okay.	16	A	the process.
17	Α	But I believe it just had the description of	17	Q	Okay. I'm going to direct you back to
18		what they were	18		Exhibit #15. And if you go down to a third
19	Q	And who would do that providing?	19		of the way down that first block paragraph, "In
20	Α	It's a form that was printed or that you could	20		the Town of Benton, Louisiana on Wednesday
21		print.	21		October 24, 2018, between the hours of 10:00
22	Q	From your office?	22		a.m. and 4:00 p.m., the following described
23	A	Correct.	23		property". Is that setting forth the sale
24	Q	Would you send that to the third appraiser?	24		date the promissory note?
25	Α	Yes.	25	Α	Looks like it's the projected date. I don't
			1		
		99 know if that was the date of the sale.	1		100 MR . MARTIN:
1 2	0	know if that was the date of the sale.	1 2		MR. MARTIN:
2	Q	know if that was the date of the sale. Okay. Now when it says I have provided Mr.	2	0	MR. MARTIN: Yeah.
2 3	Q	know if that was the date of the sale.  Okay. Now when it says I have provided Mr.  Lacour information about the note, do you recall	2 3	Q	MR. MARTIN: Yeah. Do you recall if you had any telephone
2 3 4	Q	know if that was the date of the sale. Okay. Now when it says I have provided Mr. Lacour information about the note, do you recall what information	2 3 4	Q	MR. MARTIN: Yeah. Do you recall if you had any telephone conversations with Mr. Shelton at this point?
2 3 4 5	Q	know if that was the date of the sale.  Okay. Now when it says I have provided Mr.  Lacour information about the note, do you recall what information  MR. SHELTON:	2 3 4 5	~	MR. MARTIN: Yeah.  Do you recall if you had any telephone conversations with Mr. Shelton at this point? I don't know if they were I do not.
2 3 4	Q	know if that was the date of the sale. Okay. Now when it says I have provided Mr. Lacour information about the note, do you recall what information	2 3 4	А	MR. MARTIN: Yeah.  Do you recall if you had any telephone conversations with Mr. Shelton at this point? I don't know if they were I do not. Correspondence, yes.
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2 3 4 5 6 7 8	Q	know if that was the date of the sale.  Okay. Now when it says I have provided Mr.  Lacour information about the note, do you recall what information  MR. SHELTON:  What are you referring to, Counsel?	2 3 4 5 6	A Q	MR. MARTIN: Yeah.  Do you recall if you had any telephone conversations with Mr. Shelton at this point? I don't know if they were I do not. Correspondence, yes.
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2 3 4 5 6 7 8 9 10 11		know if that was the date of the sale.  Okay. Now when it says I have provided Mr.  Lacour information about the note, do you recall what information  MR. SHELTON:  What are you referring to, Counsel?  MR. MARTIN:  On back of Exhibit #20.  MR. LANGLEY:  Okay, thank you.  When it says about halfway down the page, I have provided Mr. Lacour information about the note	2 3 4 5 6 7 8 9 10 11	A Q A Q A	MR. MARTIN: Yeah.  Do you recall if you had any telephone conversations with Mr. Shelton at this point? I don't know if they were I do not. Correspondence, yes. And we've looked at some of that correspondence; correct the e-mails? Correct. Okay, that's fine. We don't you don't remember if there was a telephone call?
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			1		
		101			102
1		expect a recommendation to you or do you expect	1		appraisement or the
2		a direct communication with a potential third	2	Q	Oh, I'm sorry, no. Number twenty, the next one.
3		appraiser or do you just not remember?	3	A	Okay. I'm sorry. If you repeat that
4		MR. LANGLEY:	4		question I didn't
5		Object to the form of the question.	5	Q	Do you recall doing anything after that point to
6		You can answer it if you know.	6		find a third appraiser on your own?
7	A	I don't know how he would have	7	А	I would have checked with Mr. Sutherland.
8	Q	Okay.	8	0	You would have?
9	A	honestly if I	9	A	I would have checked with him to
10	Q	You don't remember your expectations?	10	Q	Keep looking for one?
11	A	No, uh-uh.	11	Ā	To ask advice on what would to do next.
12	Q	Be fair to say you don't remember expecting him	12	Q	Okay. Do you remember going to
13	~	to go directly to a third appraiser? You don't	13	Ā	No.
14		recall having that expectation?	14	0	Mr. Sutherland? Do you remember taking any
15	А	I just I didn't have any.	15	×	action to find a third appraiser after that
16	0	Okay.	16		point?
17	A	I mean, to be honest, no expectations.	17	А	I don't remember if or what action.
18	0	Okay. Since October 12, 2018, that e-mail	18	0	Okay. Do you remember discussing the third
19	Q	and you say you don't remember reading it do	19	Q	appraiser for with anyone else after this
20		you remember doing anything after that point to	20		point?
21		find a third appraiser or a potential third	21	7\	No.
22		appraiser?	22	A	Okav. Looks like Mr. Lacour's contact
	71	October 12th e-mail from?	23	Q	
23	A	Mr. Shelton.	24		information was given to you here based on what
24 25	Q	Okay. The one with the oath and the	25		you just said. I thought you said you did not call Mr. Patrick Lacour on October 12th?
25	A	Okay. The one with the oath and the	25		call Mr. Patrick Lacour on october 12th;
		402			404
1	A	103 I don't recall if I did or did not.	1		104  If she had ever seen
1 2		I don't recall if I did or did not.	1		-
2	A Q	I don't recall if I did or did not. Exhibit #21 I'm handing you now. Do you recall	1 2		If she had ever seen MR. LANGLEY:
2	Q	I don't recall if I did or did not.  Exhibit #21 I'm handing you now. Do you recall getting this e-mail?	1 2 3		If she had ever seen
2 3 4	Q A	I don't recall if I did or did not.  Exhibit #21 I'm handing you now. Do you recall getting this e-mail?  I do not.	1 2 3 4		If she had ever seen MR. LANGLEY: or what it is? MR. MARTIN:
2 3 4 5	Q	I don't recall if I did or did not.  Exhibit #21 I'm handing you now. Do you recall getting this e-mail?  I do not.  Looks like it's another e-mail from Mr. Shelton	1 2 3 4 5		If she had ever seen MR. LANGLEY: or what it is? MR. MARTIN: If she had yeah, what's a sheriff's
2 3 4 5 6	Q A Q	I don't recall if I did or did not.  Exhibit #21 I'm handing you now. Do you recall getting this e-mail?  I do not.  Looks like it's another e-mail from Mr. Shelton to you.	1 2 3 4 5 6		If she had ever seen MR. LANGLEY:     or what it is? MR. MARTIN:     If she had yeah, what's a sheriff's commission. What is
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		105			106
1		usually pays or even the Fifty Dollars (\$50.00)	1		attorney's fees appraiser's fees?
2		the statute authorizes without Board approval."	2	Α	Correct.
3		And he says, "As we have discussed, it will	3	Q	Okay.
4		likely not be possible to find someone to do the	4	Α	That's not a form I'm familiar with seeing.
5		appraisal, the promissory note for the amount	5	Q	Okay. I think earlier we discussed whether you
6		the sheriff usually pays." Do you recall those	6		had phone conversations with Mr. Shelton prior
7		discussions?	7		to whatever point we were at then, September
8	Α	No.	8		21st. Do you recall if you had telephone
9	Q	Do you recall ever having a discussion with	9		conversations with Mr. Shelton by this point,
10		anyone in the sheriff's sale context about	10		October 12th?
11		fixing appraiser's fees?	11	A	I do not.
12	Α	No.	12	Q	Okay.
13	Q	This would be the if this was indeed a motion	13	A	I just wouldn't know what he sounded like on the
14		to fix appraiser's fees this would be the first	14		phone today.
15		for you that you recall?	15	Q	Sure. Okay. I'm going to hand you Exhibit #22.
16		MR. LANGLEY:	16	-	Is this an e-mail from you to
17		Object to Counsel object to the form	17	А	That's
18		of the question. Not what she said. You	18	Q	Mr. Shelton?
19		can answer it.	19	Ā	Yes, that's correct.
20		MR. MARTIN:	20	Q	Do you recall sending this e-mail?
21		I'll rephrase it.	21	A	No, sir.
22		MR. LANGLEY:	22	0	It says, "Mr. Shelton, the sheriff has signed
23		Okay, thank you.	23	~	your paperwork for the above referenced suit.
24	0	I'm not trying to put words in your mouth. I	24		Please advise when you would like to come by and
25	×	think you said you don't recall a motion to fix	25		pick up. Thanks, Kim." If Mr. Shelton had come
		100 100 100 100 100 100 100 100 100 100			Factor of the control
		107			100
1		107 to pick up that paperwork, would you have	1		108 how to answer it because it was
1 2		to pick up that paperwork, would you have	1 2	0	how to answer it because it was
2	A	to pick up that paperwork, would you have recognized him?	2	Q A	how to answer it because it was And maybe it's not
2 3	A	to pick up that paperwork, would you have recognized him? No, sir. He would have had to identify himself	2 3		how to answer it because it was And maybe it's not it was a civil you know, anything
2 3 4	A	to pick up that paperwork, would you have recognized him?  No, sir. He would have had to identify himself or I don't wouldn't know if he's a runner, so	2 3 4	A	how to answer it because it was And maybe it's not it was a civil you know, anything sheriff's sale, he, you know, wasn't
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A	to pick up that paperwork, would you have recognized him? No, sir. He would have had to identify himself or I don't wouldn't know if he's a runner, so no.  Do you know what paperwork you're referencing in this e-mail? No.  We talked a lot about communications with attorneys with Ms. Taylor, with Ms. Horne and Mr. Sutherland. Do you recall ever speaking to the sheriff himself, Sheriff Whittington, about any of this? No, sir.  Did anyone ever tell you Sheriff Whittington said something to them No.  about this matter? No, sir. Is that difficult for the sheriff not to be involved with the sheriff sale?  MR. LANGLEY:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q	how to answer it because it was And maybe it's not it was a civil you know, anything sheriff's sale, he, you know, wasn't Did he entrust it to you guys in the civil department? As our job or I mean, that was the job was civil was the sheriff's sale, so Maybe the better way to ask it is do you recall a time in civil ever having the sheriff personally involved? No. It's no. You don't recall the sheriff personally approving any of your actions? That's correct. Had you ever spoken with the sheriff? Like how? Like In any context? Did you know Sheriff Whittington? Yes. Okay. He's my employer, so I mean other than that, not

1					
		109			110
1	A	Uh-huh.	1		tomorrow and sign the appraiser form? We need
2	Q	You never went to him with issues with the sale,	2		to have it ASAP. Thank you so much for your
3		I think you said?	3		help." Did you send that e-mail?
4	Α	Correct.	4	Α	Yes.
5	Q	Okay. Can you recall I'm going to hand you -	5	Q	Do you remember sending that e-mail?
6		-	6	Α	No.
7		COURT REPORTER:	7	Q	Did you know who Mr. Lacour was at this point?
8		Twenty-three.	8	Α	No.
9		MR. MARTIN:	9	Q	Why did you ask is Mr. Lacour going to be able
10		What's that?	10		to come by tomorrow and sign the appraiser form?
11		COURT REPORTER:	11	А	I guess I'm sorry, are you asking like
12		Twenty-three.	12	Q	On October 18th, did you know who he was?
13	Q	Twenty-three. Now, we're going to have to read	13	A	He
14	~	this one backwards. I'm sorry.	14		MR. LANGLEY:
15	А	Okay.	15		Yes or no.
16	0	Yeah, just help me with that. On this second	16	Α	Yes.
17	×	page it's marked BSO85 on the bottom. It	17	0	Okay. Who was it?
18		appears to be an e-mail from you.	18	Σ Α	He was a third party appraiser. I think that
19	A	Okay.	19	л	was his title maybe.
20	0	It says, "On October 18, 2018 at 3:04 p.m., Kim	20	0	And that's on October 18, 2018?
21	Q	Flournoy wrote, Mr. Shelter, I have the	21	Q A	That's correct.
22		-	22	0	
23		sheriff's signature on the Ex Parte motion to	23	Q	Now, earlier on the advertisement and you don't have to turn to it, but it said October
24		fix appraiser's fees. Would you like a runner	24		
		to pick up the file at the clerk's office?	25		24, 2018. Was a third appraisal required at
25		Also, is Mr. Lacour going to be able to come by	25		this point?
		444			442
1	Δ	I don't know without the date on the	1		heen in civil I don't
1 2	A	I don't know without the date on the	1 2	0	been in civil I don't
2		I don't know without the date on the advertisement?	2	Q	been in civil I don't Okay. Back to #23, that October 18th e-mail
2 3	Q	I don't know without the date on the advertisement? Uh-huh.	2 3	Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about
2 3 4		I don't know without the date on the advertisement? Uh-huh. I don't know without it's just hard to	2 3 4	Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to
2 3 4 5	Q A	I don't know without the date on the advertisement? Uh-huh. I don't know without it's just hard to remember this with the steps.	2 3 4 5	Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form"
2 3 4 5 6	Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?	2 3 4 5 6	Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know
2 3 4 5 6 7	Q A Q A	I don't know without the date on the advertisement? Uh-huh. I don't know without it's just hard to remember this with the steps. And we had that was #23; is that right? Right.	2 3 4 5 6 7		been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour.
2 3 4 5 6 7 8	Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize	2 3 4 5 6 7 8	А	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh.
2 3 4 5 6 7 8	Q A Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?	2 3 4 5 6 7 8		been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the
2 3 4 5 6 7 8 9	Q A Q A	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I	2 3 4 5 6 7 8 9	A Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser?
2 3 4 5 6 7 8 9 10	Q A Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.	2 3 4 5 6 7 8 9 10	A Q A	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I
2 3 4 5 6 7 8 9 10 11	Q A Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?	2 3 4 5 6 7 8 9 10 11	A Q A Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay.
2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?  It's a form with information on I'm not sure.	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay. I don't I'm just going by what was on these.
2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?  It's a form with information on I'm not sure.  It's something for the deed. I'm not sure.	2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay. I don't I'm just going by what was on these. You said earlier that a third appraiser
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?  It's a form with information on I'm not sure.  It's something for the deed. I'm not sure.  And is that the same case number we were talking about earlier, 1-2-7-5-7-3?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay. I don't I'm just going by what was on these. You said earlier that a third appraiser MR. LANGLEY: Excuse me, she's looking for something.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?  It's a form with information on I'm not sure.  It's something for the deed. I'm not sure.  And is that the same case number we were talking about earlier, 1-2-7-5-7-3?  Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay. I don't I'm just going by what was on these. You said earlier that a third appraiser MR. LANGLEY: Excuse me, she's looking for something. MR. MARTIN:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	I don't know without the date on the advertisement?  Uh-huh.  I don't know without it's just hard to remember this with the steps.  And we had that was #23; is that right?  Right.  I'm going to hand you #24. Do you recognize this document?  Not this particular one, but this form, yes, I do.  What is this form for?  It's a form with information on I'm not sure.  It's something for the deed. I'm not sure.  And is that the same case number we were talking about earlier, 1-2-7-5-7-3?  Yes.  So, this is your file?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A	been in civil I don't Okay. Back to #23, that October 18th e-mail from you at 3:04 p.m. and I'm just asking about the sentence "Is Mr. Lacour going to be able to come by tomorrow and sign the appraiser form" and I asked you who was Mr. Lacour, did you know Mr. Lacour. Uh-huh. And correct me if I'm wrong, you said he was the third appraiser? That's what it said he was. I Okay. I don't I'm just going by what was on these. You said earlier that a third appraiser MR. LANGLEY: Excuse me, she's looking for something. MR. MARTIN: My apologies.
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		113			114
1		appraiser.	1	A	To have three, yes, you would.
2	A	According to this e-mail that's what it seems.	2	Q	So, who made Mr. Lacour the third appraiser?
3	Q	You said earlier at the beginning that a third	3	Α	I do not know that.
4		appraiser is required if the first two	4	Q	Was it you?
5		appraisals differ by more than ten percent	5	A	No. I do not
6		(10%)?	6	Q	Somebody else?
7	Α	Yes.	7	A	I couldn't answer that.
8	Q	If there aren't two appraisals in, you can't	8	Q	Okay.
9		have a differing of ten percent (10%), can you?	9		MR. LANGLEY:
10	Α	I wouldn't think so.	10		It's all right. Just quit scrambling
11	Q	So, you can't have a third appraiser before two	11		around.
12		appraisals are in?	12	Q	Yeah. You don't need to
13		MR. LANGLEY:	13		MR. LANGLEY:
14		Object to the form of the question.	14		Just tell him what you know.
15		You can answer if you have an answer for	15	Q	Okay. So, at this point you're still asking Mr.
16		that.	16	~	Shelton if Mr. Lacour's going to come by?
17	A	You can't have a third without a second if	17		MR. LANGLEY:
18		that's what you're asking.	18		Which report are you talking about?
19	0	Yeah.	19		MR. MARTIN:
20	A	Okay.	20		I'm still October 18th at 3:04 p.m.
21	0	If Mr. Lacour was the third appraiser at this	21		MR. LANGLEY:
22	Q	point, October 18, 2018, that means you've	22		Oh, okay.
23		already got the two; right?	23	Q	It's on the second page of Exhibit #23.
24	А	Theoretically.	24	Q	WITNESS:
25	0	Yeah.	25		I was on #25.
123	Q	icaii.	43		1 was on π25.
		445			440
1		MR LANGLEY:			116 Looks like that's the next day. Friday. October
1 2		MR. LANGLEY:	1		Looks like that's the next day, Friday, October
2	Δ	MR. LANGLEY: Yeah, no problem.	1 2	Δ	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail?
2	A	MR. LANGLEY: Yeah, no problem. Okay. Yes, that's correct.	1 2 3	A	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail? No. I'm sorry.
2 3 4	A Q	MR. LANGLEY: Yeah, no problem. Okay. Yes, that's correct. Okay. To your knowledge, had you spoken to Mr.	1 2 3 4	Q	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail?  No. I'm sorry.  And I'm going to have to ask you
2 3 4 5	Q	MR. LANGLEY: Yeah, no problem. Okay. Yes, that's correct. Okay. To your knowledge, had you spoken to Mr. Lacour directly by 3:04 p.m. on October 18th?	1 2 3 4 5	Q A	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail?  No. I'm sorry.  And I'm going to have to ask you I know.
2 3 4 5 6	Q A	MR. LANGLEY: Yeah, no problem. Okay. Yes, that's correct. Okay. To your knowledge, had you spoken to Mr. Lacour directly by 3:04 p.m. on October 18th? I do not know.	1 2 3 4 5 6	Q A Q	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail?  No. I'm sorry.  And I'm going to have to ask you I know.  that every time.
2 3 4 5 6 7	Q	MR. LANGLEY: Yeah, no problem.  Okay. Yes, that's correct.  Okay. To your knowledge, had you spoken to Mr.  Lacour directly by 3:04 p.m. on October 18th?  I do not know.  Would you have been asking Mr. Shelton what Mr.	1 2 3 4 5 6 7	Q A	Looks like that's the next day, Friday, October 19, 2018. Do you recall receiving this e-mail?  No. I'm sorry.  And I'm going to have to ask you I know.  that every time.  It's obviously, you know, my e-mail, but no, I
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		117			118
1		spoke or not.	1	A	Or is it the first time I spoke to him or
2	Q	The first page of Exhibit #23 looks like an e-	2	Q	Is that the first written indication of anything
3		mail from you again.	3		we've looked at today showing that you spoke to
4	А	Yes.	4		Mr. Lacour?
5	Q	"Mr. Shelton, I spoke with Mr. Lacour and he	5		MR. LANGLEY:
6		will be by our office on Monday to sign the	6		I object to the form of the question.
7		form. Thank you both for your help and have a	7		Documents speak for themselves. You can
8		great weekend." Do you recall sending that?	8		answer it if you know.
9	Α	No, sir.	9	Α	This is the only documentation that I see from
10	Q	When you say I spoke with Mr. Lacour, would that	10		him, so
11		be by the phone, do you think?	11	Q	Okay.
12	A	I don't know.	12	A	And this paperwork.
13	Q	Okay. I just asked	13	Q	And you do not recall speaking to Mr. Lacour
14	A	Yeah. You can infer	14	~	prior to October 19, 2018 at 1:54 a.m.?
15	Q	Inferring from your own language	15	А	Correct.
16	A	but I can't I can't	16	0	And that's the day after October 18, 2018 when
17	0	because	17	×	you asked Mr. Shelton if Mr. Lacour was going to
18	A	confirm a hundred percent (100%).	18		come back. And that's not a question, sorry.
19	0	Sure. Based on what we've looked at today up	19		And that top e-mail is Patrick Lacour, CIA I
20	Q	<del>-</del> _	20		<del>-</del>
		through Exhibit #23, is this the first instance			think that says CIA CVA to Kim Flournoy K.
21		where you state that you spoke with Mr. Lacour?	21		Flournoy at Bossier Sheriff. "Kim, please see
22		MR. LANGLEY:	22		attached. I'll be driving up shortly." Do you
23		You mean is this the first time that	23	_	recall receiving that?
24		that reference appears in any of these	24	A	No.
25		documents? I'm confused.	25	Q	Why would Mr. Patrick Lacour be driving up?
1		119 MR LANGLEY:	1	0	Do you recognize this document?
1 2		MR. LANGLEY:	1 2	Q A	Do you recognize this document?
2		MR. LANGLEY: Object to the form of the question.	2	A	Do you recognize this document? No, sir.
2 3	7	MR. LANGLEY: Object to the form of the question. Answer if you know.	2 3		Do you recognize this document? No, sir. Okay. You don't recognize it. Did Mr. Lacour
2 3 4	A	MR. LANGLEY:  Object to the form of the question.  Answer if you know.  I don't know why. I can't speculate as to why.	2 3 4	A Q	Do you recognize this document? No, sir. Okay. You don't recognize it. Did Mr. Lacour bring you an appraisal?
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		121			122
1	Α	I don't remember if he came in or	1	A	What do you mean write it down, like the we
2	Q	Okay.	2		have an appraisement sheet. I don't it I
3	A	not.	3		don't see one in here, but it has the Appraiser
4	Q	You wouldn't	4		1, Appraiser 2, Appraiser 3 and
5	A	I don't know if I was at lunch. I don't know	5	Q	What do you do with that Appraiser 3?
6		who he gave it to if he did.	6	Α	All the numbers are on there and from there is
7	Q	Do you know what Mr. Lacour looks like?	7		how you get your calculation of the sale price
8	Α	No, sir.	8		itself.
9	Q	If he called you today, would you recognize his	9	Q	Okay. And who does that calculation?
10		voice?	10	A	I guess either I don't know. It's hard to
11	A	No, sir.	11		say who typically does it versus who does it,
12	Q	Goes without saying that based on what you told	12		who did it so it's
13	~	me that you didn't ask Mr. Lacour for the basis	13	Q	Okay.
14		for his appraisal, why did he value anything	14	~ A	different.
15		like he did?	15	Q	Who typically does it?
16	А	No.	16	A	Whomever the sale would be assigned to the
17	0	Okay, that's fine. Who would be responsible for	17	А	clerk.
18	Q	fixing the sale price after the third appraisal	18	$\circ$	Not you? When you say the sale would be
19			19	Q	
1	7\	came out?			assigned to, you're not referring to this file?
20	A	I believe that's set by law also, isn't it?	20	7	You're referring
21	^	Like the	21	A	The file. I apologize, yeah.
22	Q	Okay.	22	Q	So, generally if it was your file it would be
23	A	The guidelines, it's set by law.	23	_	you doing the calculation?
24	Q	Do you write it down though? Somebody write it	24	A	(No audible response.)
25		down for this file?	25	Q	If you don't know, you don't
	_	123			124
1	A	I don't. I'm sorry. I'd have to	1	Q	I understand Mr. Shelton is trying to help you.
2	A Q	I don't. I'm sorry. I'd have to Typically someone has to send that calculation	1 2	Q	I understand Mr. Shelton is trying to help you. $$\operatorname{MR}.$$ SHELTON:
2 3		I don't. I'm sorry. I'd have to Typically someone has to send that calculation to whoever's running the sale; is that right?	1 2 3	~	I understand Mr. Shelton is trying to help you.  MR. SHELTON:  No, I'm trying to help you.
2 3 4		I don't. I'm sorry. I'd have to Typically someone has to send that calculation to whoever's running the sale; is that right? MR. SHELTON:	1 2 3 4	Q Q	I understand Mr. Shelton is trying to help you.  MR. SHELTON:  No, I'm trying to help you.  I'm asking you who transmits that to whoever's
2 3 4 5		I don't. I'm sorry. I'd have to Typically someone has to send that calculation to whoever's running the sale; is that right? MR. SHELTON: I want to object to these questions	1 2 3 4 5	~	I understand Mr. Shelton is trying to help you.  MR. SHELTON:  No, I'm trying to help you.  I'm asking you who transmits that to whoever's administering the sale on the sale though?
2 3 4		I don't. I'm sorry. I'd have to Typically someone has to send that calculation to whoever's running the sale; is that right?  MR. SHELTON:  I want to object to these questions because they're entirely misleading. When	1 2 3 4	~	I understand Mr. Shelton is trying to help you.  MR. SHELTON:  No, I'm trying to help you.  I'm asking you who transmits that to whoever's
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3   Somehody says	1		by using the word "that".	1	A	
4   New Selicities can say.   4   New Selicities   5   1   1   1   1   1   1   1   1   1	2		MR. MARTIN:	2	Q	People shout out a property and case numbers and
Section   Sect	3		If the witness doesn't know, the	3		somebody says
Mail   Can make my objection to form.   6	4		witness can say.	4	A	Yes. Yes.
NR. NRTIN:	5		MR. SHELTON:	5	Q	bid at this, bid at this like in movies
Sure.  9 MR. SHELTON: 10 Look, I've sat over here and been 111 largely quiet, but that's just leaving 212 sconething out there that's wholly vague and 13 I'm sorry. 14 Q If you don't understand, you can tell me you 15 don't understand. 16 A I don't. 17 Q Okay. 18 A I'm sorry. It's I don't know. 19 Q Who administers the sale on the day of the sale? 18 A I'm sorry. It's I don't know. 19 Q Who administers the sale on the day of the sale? 10 A What are I don't administers. Could you 21 I object to the form of the question. 22 A What are I don't administers. Could you 23 clarify? 24 Q Okay. I've been to a couple of sheriff's sale, 25 okay, and I go cut there, stand in the hallway. 25 MR. LINNIERY: 26 A I guess, yeah. 27 MR. LINNIERY: 28 Gare. 29 MR. SHELTON: 20 Chay. 20 Chay. I've been to a couple of sheriff's sale, 21 Object to the form of the question, 22 A What are I don't administers. 23 Clarify? 24 Q Counsel. Could you be a little more 25 specific? 26 A I guess, yeah. 27 MR. LINNIERY: 28 Graph. 29 MR. LINNIERY: 29 MR. LINNIERY: 30 A I'vou if a piece of property sold for a 31 Hundred Thousand bollars (\$100,000.00) and it 31 was one of your files, would you know what? 32 A Yes. 33 Okay. So, someone has to get the final sale 34 Names When cleak who's working on the case 35 of the file. I'm not sure what it would 36 Okay. And who does that? 37 A Veal. 38 (SHITON): 39 A Take's Sutherland? 30 Okay. And who does that? 30 Okay. That's all I'm asking. Do you know what happened at the sale? 30 Okay. That's all I'm asking. Do you know what happened at the sale? 31 A Yesh. 32 Okay. That's the amount that's written on there. 33 Okay. That's the amount that's written on there. 34 Okay. That's the amount that's written on there. 35 Okay. That's the amount that's written on there. 36 Okay. That's the amount that's written on there. 39 Okay. That's the amount that's written on there. 30 Okay. That's the amount that's written on there. 31 Okay. That's the amount that's written on there. 32 Okay. Tha	6		Well, I can make my objection to form.	6		bidding wars. It's awfully exciting.
9	7		MR. MARTIN:	7	A	Uh-huh.
Look, I've sat over here and been li largely quiet, but that's witch leaving something out there that's wholly vague and li l'm sorry. l'q of You don't understand, you can tell me you look tunderstand. l'n sorry. l'a norry. It's - I don't know. l'q o Who administers the sale on the day of the sale? l'm sorry. l'q o (Nay. SHELTON: l'q o (Nay. Tiv's bean to a couple of sheriff's sale, okay, and I go out there, stand in the hallway. l'q o (Nay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway. l'q o (Nay. Nathreland)	8		Sure.	8	Q	Who's doing the shouting of what the case is and
li largely quiet, but that's just leaving something out there that's wholly vague and if 'm sorry.  14 Q If you don't understand, you can tell me you that are an individual and individua	9		MR. SHELTON:	9		what the price is?
12   Something out there that's wholly vague and I are sorry.   1   2   3   3   3   3   3   3   3   3   3	10		Look, I've sat over here and been	10	Α	Mr. Sutherland.
I'm sorry.  I'm so	11		largely quiet, but that's just leaving	11	Q	Mr. Sutherland?
14 Q If you don't understand, you can tell me you don't understand.  15 A I don't.  17 Q Okay.  18 A I'm sorry. It's I don't know.  19 Q Who administers the sale on the day of the sale?  10 MR. SHEETON:  21 I object to the form of the question.  22 A What are I don't administers. Could you clarify?  24 Q Okay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.  25 okay, and I go out there, stand in the hallway.  16 A I guess, yeah.  17 A Yeah. I don't know how to how to answer.  18 If not you can answer the best you can subject to my objection.  19 Q Yeah.  20 Yeah.  21 I don't remember everything that's done.  21 A Yeah. I don't know how to how to answer.  22 Q Okay. What else do you have to do?  23 A Yeah. I don't know how to how to answer.  24 A Yeah. I don't know how to how to answer.  25 Jeases yeah.  26 A Yeah. I don't know how to how to answer.  27 A Yeah. I don't know how to how to answer.  28 A Yeah. I don't know how to how to answer.  29 A Yeah.  30 A Yeah. I don't know how to how to answer.  31 A Yeak.  32 A What else do you have to do?  33 A I'm sorry. I guess  34 A Yeah. I don't know how to how to answer.  35 A Correct.  36 A Yeah. I don't know how to how to answer.  37 A Yea.  38 A I'm sorry. I guess  39 A Yeah. I don't know how to how to answer.  30 A Yeah. I don't know how to how to answer.  31 A Yea.  32 A What else do you have to do?  33 A I don't  34 A Yea.  35 A Correct.  46 A J don't know how to how to answer.  47 A I don't remember everything that's done.  48 Q Okay. What else do you have to do?  49 A It's hard to speculate which things.  40 D people owe the sheriff money for fees incurred in  40 Yea.  40 Yea.  41 A I don't  41 A Yea.  42 A J I don't  43 A Yea.  44 A Hondred Thousand Dollars (\$100,000.00) and it incurred in  49 Yea.  40 Yea.  41 A Yea.  41 A Yea.  42 A Yea Yea.  43 A Yea Yea.  44 A Honestly I don't hemember wereyrything that's done.  45 A Yea Yea Yea.  46 A Yea Yea Ye	12		something out there that's wholly vague and	12	Α	James Sutherland.
15	13		I'm sorry.	13	Q	Okay. So, someone has to get the final sale
16	14	Q	If you don't understand, you can tell me you	14		number to Mr. Sutherland, the appraisal number?
17 Q   Okay   18 A   I'm sorry. It's I don't know.   18 A   I'm sorry. It's I don't know.   18 Q   Who administers the sale on the day of the sale?   19 Q   Okay. So, typically if it's your file it's you who would communicate that to Mr. Sutherland?   20 Who administers the sale on the day of the guestion.   21 A   Yes.   22 Q   Okay. I'we been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.   17 A   Yes.   17 Q   Yeah.   28 A   Yes, that's the amount that's written on there.   28 Q   Okay. Mat else do you have to do?   29 Q Okay. What else do you have to do?   29 Q Okay. What else do you have to do?   20 Q Okay.	15		don't understand.	15	Α	Correct.
18 A I'm sorry. It's I don't know. 19 Q Who administers the sale on the day of the sale? 20 MR. SHELTON: 21 I object to the form of the question. 22 A What are I don't administers. Could you clarify? 23 clarify? 24 Q Okay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.  127 1 the sale of a file you were in charge of? 2 MR. LANKLEY: 3 Object to the form of the question, 4 Counsel. Could you be a little more specific? 6 A I guess, yeah. 7 MR. LANKLEY: 8 If not you can answer the best you can subject to my objection. 10 A Yeah. I don't know how to how to answer. 11 I'm sorry. I guess 12 Q If you if a piece of property sold for a Hundred Thousand Dollars (\$100,000.00) and it was one of your files, would you know what the sales price of the the actual sales price is suffered by Mr. 20 Who would you know that? 21 A Yes. 21 Q Why would you know that? 22 A Let me clarify. 23 Q Sure, yeah. 24 A Honestly I don't member everything that's one the form of the question. 25 Q Okay. Typically would you know what happened at the sale? 26 Q Okay. Typically would you know what happened at the sale? 27 Yeah. 28 Yes. 29 Yeah. 20 Q Okay. That's all I'm asking. Do you know what happened at the sale? 29 Yes. 20 Q Okay. Typically would you know what happened at the sale? 20 Q Okay. Typically would you know what happened at the sale? 21 Q Okay. Typically would you know what the specific of the form of the question of the reperture of the everything that's written on there. 20 Q Okay. That's all I'm asking. Do you know what happened at the sale? 21 Q Okay. Typically would you know what happened at the sale? 22 Q Okay. Typically would you know what happened at the sale? 24 Q Okay. Typically would you know what happened at the sale? 25 Q Okay. Typically would you know what happened at h	16	Α	I don't.	16	Q	Okay. And who does that?
19 Q   Who administers the sale on the day of the sale?   19 Q   Okay. So, typically if it's your file it's you who would communicate that to Mr. Sutherland?   21 A Yes.   22 A What are I don't administers. Could you clarify?   22 Q Okay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.   23	17	Q	Okay.	17	A	It would be the clerk who's working on the case
20 MR. SHELTON: 21 I object to the form of the question. 22 A What are I don't administers. Could you 23 clarify? 24 Q Okay. I've been to a couple of sheriff's sale, 25 okay, and I go out there, stand in the hallway.  27	18	A	I'm sorry. It's I don't know.	18		of the file. I'm not sure what it would
I object to the form of the question.  A What are I don't administers. Could you can okay, and I go out there, stand in the hallway.  127  1 the sale of a file you were in charge of? 2 MR. LANGLEY: 3 Object to the form of the question, counsel. Could you be a little more specific? 4 Counsel. Could you be a little more specific? 5 MR. LANGLEY: 5 Specific? 6 A I guess, yeah. 7 MR. LANGLEY: 8 If not you can answer the best you can subject to my objection. 9 Subject to my objection. 10 A Yeah. I don't know how to how to answer. 11 I'm sorry. I guess 12 Q If you if a piece of property sold for a landered Thousand Dollars (\$100,000.00) and it was one of your files, would you know what the sales price of the the actual sales price of Mry would you know that? 18 Q Why would you know that? 19 A It's written on the front of the file by Mr. 20 Sure, yeah. 21 A Yes. 22 Q Okay. That's all I'm asking. Do you know what happened at the sale? 24 A Honestly I don't remember if there I don't. 25 Q Okay. Typically would you know what happened at the sale? 24 A Yes, that's all I'm asking. Do you know what happened at the sale? 24 A Honestly I don't remember if there I don't. 25 Q Okay. Typically would you know what happened at the sale? 26 A Yes, that's all I'm asking. Do you know what happened at the sale? 27 A Yesh. 28 Yesh. 29 A Yesh. 20 Okay. Typically would you know what happened at the sale? 20 Q Okay. Typically would you know what happened at the sale? 21 Q Yeah. 22 A Yesh. 23 A Yesh. 24 A Yesh. 25 Q Okay. Typically would you know what happened at the sale? 24 A Yesh. 25 Q Okay. Typically would you know what happened at the sale? 26 Q Okay. Typically would you know what happened at the sale? 27 A Yesh. 28 Q Okay. Typically would you know what happened at the sale? 28 A Yesh. Thoselfy: 39 Q Okay. Typically would you know that the sale? 30 Q Okay. Typically would you know what happened at the sale? 30 Q Okay. Typically would you know what the sale? 31 Q Okay. Typically would you know that: 30 Q Okay. Ty	19	Q	Who administers the sale on the day of the sale?	19	Q	Okay. So, typically if it's your file it's you
22 A What are I don't administers. Could you clarify? 24 Q Okay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.  25 Okay. I've been to a couple of sheriff's sale, okay, and I go out there, stand in the hallway.  26 Okay. Typically would you know what happened at the sale?  27 A Yeah.  28 Yeah.  29 And you still have tasks to do after these properties sold?  20 Okay. Typically would you know what happened at the sale?  21 The sale of a file you were in charge of?  22 MR. LANSLEY: 23 Object to the form of the question, Counsel. Could you be a little more specific? 24 A Yeah. 25 Okay. Typically would you know what happened at the sale?  26 Okay. Typically would you know what happened at the sale?  27 A Yeah. 28 Honestly I don't remember if there I don't.  29 A Yeah. 20 Okay. Typically would you know what happened at the sale?  20 Okay. Typically would you know what happened at the sale?  21 A Yeah. 22 A Yeah. 23 A Yeah. 24 A Honestly I don't remember if there I don't. 25 Q Okay. Typically would you know what happened at the sale?  24 A Honestly I don't grow left the sale? 25 Q Okay. Typically would you know what happened at the sale? 26 Q Okay. Typically would you know what happened at the sale? 27 A Yeah. 28 A Yeah. 29 A Yeah. 20 A Yeah. 20 Okay. Typically would you know what happened at the sale? 21 A Yeah. 22 A Yeah. 23 A Yeah. 24 A Honestly I don't emember if there I don't remember everything that's done. 28 Q Okay. That's all I'm asking. 29 Okay. Typically would you know what happened at the sale? 29 A Yeah. 29 A Yeah. 20 Okay. Typically would you know what happened at the sale? 20 Q Okay. Typically would you know what happened at the sale? 21 Q Okay. Typically would you know what happened at the sale? 21 Q Okay. Typically would you know what happened at the sale? 21 Q Okay. That's all I'm on't in on't emember everything that's written on the five property and out invoices to people it would cost? 20 A I don't the sale? 21 A I don't the sale? 22 A I don	20		MR. SHELTON:	20		who would communicate that to Mr. Sutherland?
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		129			130
1	Α	I don't know.	1	Q	That's okay. Do you remember other instances
2	Q	With this particular file, do you remember what	2		where you'd go through an attorney to ask an
3		happened after the sale date?	3		appraiser for an invoice?
4	Α	No.	4	A	I don't know.
5	Q	Okay.	5	Q	Okay.
6		MR. MARTIN:	6	A	I wouldn't
7		Let's not get confused again. I think	7	Q	Next one going back to that first page, "Kenny
8		this is #26.	8		said he would send an invoice tomorrow." Do you
9		COURT REPORTER:	9		know if you ever got that invoice?
10		You're correct.	10	A	I don't recall, sorry.
11		MR. MARTIN:	11	Q	And then the last one I'm looking at is the top
12		Thank you.	12	~	of that page, from Kimberly Flournoy to Curtis
13	Q	Do you recognize this e-mail exchange?	13		Shelton. "Thank you so much for your help in
14	A	No, sir.	14		everything. I apologize for being so needy.
15	0	Okay. One of it is well, I think it starts	15		This suit has been a learning experience for me.
16	~	on sorry, it starts on the next page. the	16		Have a great day." You don't recall sending
17		back First one appears to be from you on	17		that one?
18		October 22nd. "Mr. Shelton, would you please	18	А	No, sir.
19		ask Mr. Lacour to get me an invoice ASAP so I	19	0	You said this when I asked you about going
20		can build it into my suit cost. Thank you and	20	~	through Mr. Shelton for an invoice, you said
21		have a great day." Did you normally ask	21		this was not normal this was not a normal
22		appraisers directly for an invoice?	22		sale, I believe you said?
23	А	This just wasn't a normal I don't know.	23	А	This was a promissory note and we didn't this
24	0	Yeah.	24		was the first promissory note that I've
25	Ã	I'm sorry.	25	0	But it seems like you were going through Mr.
		131			132
1		Shelton for most of your communications with Mr.	1		needy."
2		Shelton for most of your communications with Mr. Lacour; is that correct?	2		needy." MR. LANGLEY:
2 3		Shelton for most of your communications with Mr. Lacour; is that correct? MR. LANGLEY:	2 3		needy."  MR. LANGLEY:  And what's the question, Counsel?
2 3 4		Shelton for most of your communications with Mr. Lacour; is that correct?  MR. LANGLEY:  Object to the form of the question.	2 3 4	Q	needy."  MR. LANGLEY:  And what's the question, Counsel?  Why were you apologizing to Mr. Shelton?
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1		you please ask Mr. Lacour to get me invoice	1		Shelton a request? You were making a request to
2		ASAP", you don't think that's you asking	2		Mr. Shelton when you asked for a recommendation?
3	Α	Yes.	3	A	I don't think I would I guess that's kind of
4	Q	Mr. Shelton?	4		interpretation what the difference
5	A	That's yeah.	5	Q	Then what's your interpretation?
6	Q	Did in these previous e-mails we've examined	6	A	I don't know what
7	-	where you asked Mr. Shelton to for instance give	7		MR. LANGLEY:
8		a recommendation as a third appraiser	8		Objection, Counsel. This is didactic
9	A	Uh-huh.	9		and improper question and you're not to
10	0	would you construe that as asking Mr. Shelton	10		answer anymore of this crap. So, next
11	~	a question?	11		question.
12	A	Asking him a question?	12		MR. MARTIN:
13	0	Yeah.	13		I don't think I got an answer.
14	×	MR. LANGLEY:	14		MR. LANGLEY:
15		I object to the form of the question.	15		You got the answer you're going to get.
16		MR. MARTIN:	16		The questions that she asked, the
17		Sure.	17		communications that she had she's already
18	A	I don't know how to answer that, I guess.	18		told you about. They're in that paper.
19		_	19		MR. MARTIN:
	Q 7	Okay.	20		
20	A	If it was phrased as a question			I'm asking how she construes that.
21 22	Q	Would you say it was a request?	21 22		MR. LANGLEY:
	A	A question.			And she told you what communication she
23	Q	It was a question.	23		had both with Mr. Shelton and Mr. Lacour.
24	A	Are you asking a question for	24		MR. MARTIN:
25	Q	Oh, yeah. Would you say you were asking Mr.	25		And I'm asking her state of mind.
		425			426
1		MR. LANGLEY:	1		Next question.
1 2		MR. LANGLEY:	1 2	0	Next question.
2		MR. LANGLEY: Don't	2	Q	Next question. What was a learning experience about this suit
2 3		MR. LANGLEY:  Don't  MR. MARTIN:	2 3	Q	Next question.  What was a learning experience about this suit for you?
2 3 4	Δ	MR. LANGLEY:  Don't  MR. MARTIN:  And I'm able to do that.	2 3 4	Q	Next question.  What was a learning experience about this suit for you?  MR. LANGLEY:
2 3 4 5	A	MR. LANGLEY:  Don't  MR. MARTIN:  And I'm able to do that.  I don't know if I	2 3 4 5	Q	Next question.  What was a learning experience about this suit for you?  MR. LANGLEY:  She's answered that question, too.
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2 3 4 5 6 7 8 9	A	MR. LANGLEY:  Don't  MR. MARTIN:  And I'm able to do that.  I don't know if I  MR. LANGLEY:  No, not today you're not.  MR. MARTIN:  Okay. I would really like not to come	2 3 4 5 6 7 8 9	Q	Next question.  What was a learning experience about this suit for you?  MR. LANGLEY:  She's answered that question, too.  MR. MARTIN:  I don't think she has.  MR. LANGLEY:  She has. She's
2 3 4 5 6 7 8 9	A	MR. LANGLEY:  Don't  MR. MARTIN:  And I'm able to do that.  I don't know if I  MR. LANGLEY:  No, not today you're not.  MR. MARTIN:  Okay. I would really like not to come back and have to do this again.	2 3 4 5 6 7 8 9	Q	Next question.  What was a learning experience about this suit for you?  MR. LANGLEY:  She's answered that question, too.  MR. MARTIN:  I don't think she has.  MR. LANGLEY:  She has. She's  MR. MARTIN:
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		137			138
1		Shelton represented Mr. Lucky?	1		MR. LANGLEY:
2	A	Yes, sir. He's on the Writ, yes, sir.	2		Don't guess.
3	Q	Okay. Did you understand him in communicating	3	A	I don't know
4		with you to be working on behalf of Mr. Lucky?	4		MR. LANGLEY:
5	A	I was I'm sorry. I don't know how to	5		If you know.
6		could you rephrase that, I guess, and	6	A	I mean, I don't know how to answer.
7	Q	You understand that a lawyer works on behalf of	7	Q	Okay. Was his recommendation helpful to you?
8		a client?	8	Α	I don't know how to I didn't have a personal
9	Α	Correct.	9		interest, so I don't know how to
10	Q	Okay. Did you understand him in his	10	Q	Didn't help you learn anything?
11		communications to you to be working on behalf of	11	A	I like criminal law better.
12		his client?	12	Q	Okay.
13	A	I understand he represented him, so	13	A	I just
14	Q	Okay. So, when he recommended an appraiser to	14		MR. LANGLEY:
15		you, did you understand to be recommending	15		You answered his question.
16		something that would be good for his client?	16	Q	Earlier we looked at an e-mail where Mr. Shelton
17		MR. LANGLEY:	17		told you that he had contacted Mr. Lacour and
18		Object to the form of the question.	18		provided him information. Do you recall us
19		You can answer it if you have an answer.	19		looking at that e-mail?
20	Α	I have I wouldn't know I wouldn't know	20	Α	Yes.
21		what he was	21	0	Okay. Correct me if I'm wrong, but I believe
22	0	Did you understand him to be doing you a favor?	22	~	you said you don't know what information was
23	A	Doing	23		provided.
24	Q	Right. Providing a recommendation?	24	Α	Okay. I think this is one.
25	A	I don't really know how to answer. I guess	25	Q	That's it.
		139			140
1	A	Okay. Could you repeat that, I'm sorry?	1		MR. MARTIN:
1 2	A Q				
		Okay. Could you repeat that, I'm sorry?	1		MR. MARTIN:
2		Okay. Could you repeat that, I'm sorry? Yeah. You do not know what information Mr.	1 2		MR. MARTIN: I'm asking a separate question.
2 3	Q	Okay. Could you repeat that, I'm sorry? Yeah. You do not know what information Mr. Shelton provided there, do you?	1 2 3		MR. MARTIN: I'm asking a separate question. MR. LANGLEY:
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2 3 4 5	Q A Q	Okay. Could you repeat that, I'm sorry? Yeah. You do not know what information Mr. Shelton provided there, do you? No, sir. Okay. Still don't?	1 2 3 4 5		MR. MARTIN:  I'm asking a separate question.  MR. LANGLEY:  It's a question that's been asked and answered all day. If you have an answer to
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1		He provided him information and you did none of	1		Just kind of let it happen?
2		those things until your first recollecting being	2		MR. LANGLEY:
3		October 18, 2018?	3		This has been asked and answered,
4	A	I don't know what all I can't answer for	4		Counsel. If you have another set of
5		other	5		questions, you can ask them. Otherwise
6	Q	You can't answer for anybody else and that's	6		MR. MARTIN:
7		right. Did it occur to you at this time that	7		I'm recapping the relations.
8		Mr. Shelton may have been trying to help his	8		MR. LANGLEY:
9		client in this?	9		No, you can't recap it because we've
10	А	I didn't	10		already done gone through this at least
11	Q	Did you trust Mr. Shelton at this time?	11		twice. That's it. Next question.
12	Α	I didn't	12	Q	Now, you've already said that you knew that Mr.
13		MR. SHELTON:	13		Shelton represented Mr. Lucky.
14		Object to the form	14		MR. LANGLEY:
15	Α	know him.	15		That's been asked and answered as you
16		MR. SHELTON:	16		objected.
17		of the question.	17		MR. MARTIN:
18	Q	You didn't know him?	18		I'm setting up a question, that's why I
19	Α	Like I didn't I don't we didn't have a	19		started with you've already said comma.
20		personal relationship. I don't know to trust or	20	Q	Were you aware that Mr. Lucky had an interest in
21		not trust. It's just it's business.	21		the outcome of this sale?
22	Q	Sure. And he sent information you don't know	22	A	I don't know who Mr. Lucky was, so I
23		what information to Mr. Lacour?	23	Q	Back to Exhibit #17. That's your affidavit and
24	Α	It didn't specify us in that.	24		fourth page. "I contacted Curtis Shelton for a
25	Q	It didn't specify, so you did not look into it?	25		recommendation and he provided me with the name
		143			144
1		of Patrick Lacour." Then to fifteen, "I spoke	1		don't remember.
2		of Patrick Lacour." Then to fifteen, "I spoke with Patrick Lacour regarding performing the	2	Q	don't remember. It's been a long time since the events we're
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		145			146
1	A	I mean, scientifically, I think that's how it's	1		MR. SHELTON:
2		supposed to work, but I don't know.	2		No, I don't care. You're talking about
3	Q	So, if we had tried to depose you in November of	3		Exhibit K?
4		2019, we might have better recollections of what	4		MR. MARTIN:
5		happened?	5		Exhibit K.
6		MR. LANGLEY:	6		MR. LANGLEY:
7		You don't have to answer that. Next	7		Exhibit K to Exhibit #2.
8		question, Counsel.	8		MR. SHELTON:
9	Q	I'm going to hand you a document. It's actually	9		Yeah, that's fine.
10	×	part of Exhibit #2. It is going to be marked	10	Q	Have you ever seen this document?
11		#2K	11	A	No, sir.
12		MR. LANGLEY:	12	0	Do you know based on looking at it who it's
13		This is the document that he's	13	Q	from?
				71	
14		referring to. Do you mind if I show her the	14	A	It's signed Curtis R. Shelton.
15		document?	15	Q	Okay. And what's the date on this?
16		MR. MARTIN:	16	A	October 10, 2018.
17		That's totally fine, yes. And if we	17	Q	Okay. And if we look at Exhibit #20.
18		could separately label this if you want,	18		MR. MARTIN:
19		but	19		I could just show you my copy if you
20		MR. LANGLEY:	20		have a problem accessing it.
21		Not on my account.	21		MR. LANGLEY:
22		MR. MARTIN:	22		I got it.
23		What?	23		MR. MARTIN:
24		MR. LANGLEY:	24		Okay.
25		You don't have to do it on my account.	25	Q	Can you tell me the date on that e-mail from Mr.
_			_		
		4.47			440
1		147 Shelton?	1		148 COURT REPORTER:
1 2	A	Shelton?	1 2		COURT REPORTER:
2		Shelton? That says October 12, 2018.	2		COURT REPORTER: Okay.
2 3	A Q	Shelton? That says October 12, 2018. Yeah. And that's the e-mail where Mr. Shelton	2 3		COURT REPORTER: Okay. MR. LANGLEY:
2 3 4		Shelton? That says October 12, 2018. Yeah. And that's the e-mail where Mr. Shelton tells you that he's contacted Mr. Lacour and	2 3 4		COURT REPORTER: Okay. MR. LANGLEY: Yeah. So, you don't need another one.
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		149			150
1	Q	Okay.	1	Q	And you haven't even looked at this document
2	A	who appointed the third one. I'm sorry.	2		before we're looking at it right now? It was
3	Q	Okay.	3		part of the amended complaint, but you haven't
4	Α	I don't.	4		seen this part, have you? No.
5	Q	If you go to page three, the I guess first full	5	A	No, sir.
6		paragraph on page three, which is about halfway	6	Q	Okay. Page four, halfway down, "Lucky Carr 2
7		down the page. It says, "The parts of the	7		was filed because of the attempt by Ms. Lollar
8		statute which will apply to you are paragraphs A	8		to place the immovable property described in the
9		and D. I will need you to do two things." And	9		credit sale deed with vendor's lien and special
10		then you go to the end or the end of that	10		mortgage out of her name." Go to the next
11		section. I think that's the third paragraph	11		paragraph. "We caught onto Ms. Lollar's scam
12		down. "That is all the detail the sheriff will	12		and we filed Lucky 2. We believe that the
13		require." Now, when you see these words, "I	13		Notice of Lis Pendens makes the claims in second
14		will need you to do two things"	14		lawsuit effective." To your knowledge when Mr.
15		MR. SHELTON:	15		Shelton says "we" there is he speaking for you -
16		Whoa, standby.	16		-
17		MR. MARTIN:	17	А	No.
18		Yeah.	18	Q	or the sheriff's office?
19		MR. SHELTON:	19	a A	No, sir.
20		Where are you? That is all the detail	20	0	When he called something a scam, does that
21		okay, I'm with you. Thank you.	21	×	mirror your characterization of any of this?
22	0	Did you authorize this communication?	22	А	I have no idea what any of this means. I
23	Σ Α	No.	23		apologize.
24	0	All right. Because you didn't know it existed?	24	Q	Okay. I'm going to represent to you that this
25	A	No, I didn't.	25	V	is the information sent or part of the
		151			152
1		151 information sent by Mr. Shelton to Mr. Lacour.	1		0bjection. Asked and answered.
1 2					
		information sent by Mr. Shelton to Mr. Lacour.	1		Objection. Asked and answered.
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2 3		information sent by Mr. Shelton to Mr. Lacour.  MR. LANGLEY:  So, what's your question?	1 2 3	Q	Objection. Asked and answered. MR. MARTIN: Okay.
2 3 4	Q	information sent by Mr. Shelton to Mr. Lacour.  MR. LANGLEY:  So, what's your question?  MR. MARTIN:	1 2 3 4	Q	Objection. Asked and answered.  MR. MARTIN:  Okay.  Has anyone told you that a federal judge in this
2 3 4 5	Q	<pre>information sent by Mr. Shelton to Mr. Lacour.    MR. LANGLEY:         So, what's your question?    MR. MARTIN:         I'm getting to it.</pre>	1 2 3 4 5	Q	Objection. Asked and answered.  MR. MARTIN:  Okay.  Has anyone told you that a federal judge in this case has characterized this letter as one-sided
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			1		
		153			154
1	Q	Just	1		MR. LANGLEY:
2	A	Sorry.	2		Do
3	Q	Okay. You're not aware of the existence of this	3	A	I
4	~	letter until today?	4		MR. LANGLEY:
5	А	Correct.	5		Do you know? I'm going to rephrase
6	Q	Okay. Did you assume that most appraisers	6		your question because it's misleading. What
7	~	looked at what they were appraising before	7		he looked at?
8		issuing an appraisal?	8	А	No.
9	А	Honestly I don't know what the appraisers	9	0	Was there any policy in place to prevent someone
10	0	Sitting here today, would you be surprised if	10	×	like you or Ms. Taylor from handing over the
11	~	you learned that Mr. Lacour never looked at this	11		appraisal process to someone else?
12		promissory note?	12		MR. LANGLEY:
13	Α	I don't I don't know how to I mean, I'm	13		I object to the form of the question.
14	11	sorry. I just didn't know I don't know how	14		You don't have to answer that.
15		to answer, I guess.	15	А	I don't know how
16	Q	Based on your time in the civil department,	16	0	Yeah, please answer. Is there a policy
17	Q	you'd be surprised today if I told you that the	17	Q	MR. LANGLEY:
18		only thing Mr. Lacour looked at was not the note	18		You don't
19		itself, but this letter?	19	0	or guideline in place
		MR. SHELTON:	20	Q	MR. LANGLEY:
20					
21 22		I'm going to object to that. It's	21 22	^	have to answer that.
		misleading.		Q	to prevent you from letting someone handle
23		MR. LANGLEY:	23		the appraisal process for you?
24	^	Object to the form of the question.	24		MR. LANGLEY: You don't have to answer that. I'm
25	Q	Are you surprised to learn that?	25		iou don t have to answer that. I ill
		155			450
1		instructing you not to answer.	1		156 MR. I.ANGT.EY:
1 2		instructing you not to answer.	1 2		MR. LANGLEY:
2		instructing you not to answer. MR. MARTIN:	2		MR. LANGLEY: It is.
2		instructing you not to answer.  MR. MARTIN:  Are you asserting privilege? I would	2 3		MR. LANGLEY:     It is. MR. MARTIN:
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	157			158
1	It's improper for what reason?	1		our lawsuit, okay?
2	MR. LANGLEY:	2	Q	So, was there a policy in place to prevent you
3	It's improper because it's suggestive	3		from handing the process over?
4	and argumentative. It lacks foundation and	4		MR. LANGLEY:
5		5		It's been asked and answered, Counsel.
6	MR. MARTIN:	6		Move on.
7	Okay.	7		MR. MARTIN:
8	MR. LANGLEY:	8		I asked about reading policies.
9	I think it's just it's violates	9	Q	Are there unwritten policies
10	let's see, 401, 803. I'm telling you, it's	10		MR. LANGLEY:
11		11		All right. Are there unwritten
12	MR. MARTIN:	12		policies.
13	And you think that those	13	Q	to prevent you from handing over the
14	MR. LANGLEY:	14		appraisal process to somebody else?
15	an improper question.	15		MR. LANGLEY:
16	MR. MARTIN:	16		I object to the lack of a foundation to
17	Evidentiary rules are controlling over	17		the suggestion that's what happened in this
18	what questions I can ask if they're in any	18		case
19	deposition?	19		MR. MARTIN:
20	MR. LANGLEY:	20		That's fine. You can dispute the
21	They are they are controlling over	21		characterization.
22	what questions I'm going to allow my witness	22		MR. LANGLEY:
23	to answer.	23		I'm sorry, Counsel, I was talking. And
24	MR. MARTIN:	24		so I object to that question on those bases.
25	These are directly related to claims in	25		MR. MARTIN:
1	159	1		160
1	Great.	1		the form of the question. You may answer
2	Great. Q Subject to that objection?	2		the form of the question. You may answer it.
2	Great.  Q Subject to that objection?  A I don't know if there are or not.	2 3	А	the form of the question. You may answer it.  Not that I know about. Not that I'm aware of,
2 3 4	Great.  Q Subject to that objection?  A I don't know if there are or not.  Q Let's say you're ultimately	2 3 4		the form of the question. You may answer it.  Not that I know about. Not that I'm aware of, yeah.
2 3 4 5	Great.  Q Subject to that objection?  A I don't know if there are or not.  Q Let's say you're ultimately WITNESS:	2 3 4 5	A Q	the form of the question. You may answer it.  Not that I know about. Not that I'm aware of, yeah.  We discussed generally that you're aware that
2 3 4 5 6	Great.  Q Subject to that objection?  A I don't know if there are or not.  Q Let's say you're ultimately WITNESS: Can I go to the bathroom?	2 3 4 5 6		the form of the question. You may answer it.  Not that I know about. Not that I'm aware of, yeah.  We discussed generally that you're aware that you've been sued, that you haven't read the
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2 3 4 5 6 7 8	Great.  Q Subject to that objection?  A I don't know if there are or not.  Q Let's say you're ultimately WITNESS: Can I go to the bathroom? MR. MARTIN: Yeah.	2 3 4 5 6 7 8		the form of the question. You may answer it.  Not that I know about. Not that I'm aware of, yeah.  We discussed generally that you're aware that you've been sued, that you haven't read the complaint in full. I want to re-visit before we finish up here. Do you know why you in
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		404			400
1		MR. LANGLEY:	1	Q	Yes. 162
2		Object to the form of the question.	2	A	To my knowledge sheriff's sales can be stopped
3		You can answer it.	3		the day of.
4	Q	Are you aware that you have been sued as a	4	0	Did you recommend
5	~	distinct party with distinct interests from the	5	Ā	I don't know about
6		sheriff?	6	0	Do you know who would have the power to stop a
7		MR. LANGLEY:	7	~	sheriff's sale?
8		Same objection.	8	А	No, I don't.
9	А	It's just I guess it's basic knowledge.	9	0	That's it.
10	0	Sure.	10	~	MR. SHELTON:
11	A	You know, I don't have a lot.	11		I have just a couple of questions real
12	Q	Okay. I'm not asking you for a legal conclusion	12		quick.
13	-	or your legal reading. Can you tell me in short	13	EXA	MINATION BY MR. SHELTON:
14		what you understand us the plaintiffs to have	14	Q	Exhibit #27. Does that appear to you to be the
15		sued you for?	15		invoice that was received for Mr. Lacour's
16		MR. LANGLEY:	16		services as an appraiser with respect to the
17		I object to the form of the question.	17		sheriff's sale?
18	A	I don't I couldn't tell	18	A	I can't remember. It I can't say for
19	Q	Okay. I think it's the last thing, okay. Were	19		certain.
20		you aware that Mrs. Lollar filed a motion to	20	Q	Okay. The last line of it, do you see what his
21		enjoin or stop the sheriff's sale?	21		last entry is the day being I believe it's
22	A	No, sir.	22		October 22nd?
23	Q	Okay. Could you have stopped the sheriff's sale	23	A	Yes, sir.
24		on let's say October 22, 2018?	24	Q	And what does that say?
25	Α	The sheriff's sale was set for the 24th?	25	A	Drive from Alex to Benton to deliver report and
		400			404
1		163 sign appraisement.	1		Object to form.
1 2	0	sign appraisement.	1 2		Object to form.  MR. SHELTON:
	Q				Object to form.
2	Q A	sign appraisement.  Okay. Now I want you to look at Exhibit L-2,  Exhibit #2.	2	Q	Object to form. MR. SHELTON: Okay.
2		sign appraisement.  Okay. Now I want you to look at Exhibit L-2, Exhibit #2.  (Witness complies.) Okay.	2 3	Q	Object to form. MR. SHELTON:
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q	sign appraisement.  Okay. Now I want you to look at Exhibit L-2, Exhibit #2.  (Witness complies.) Okay.  And do you recognize your signature on that page?  Yes, sir.  Okay. As deputy sheriff; right?  Yes, sir.  Okay. And do you see a signature for Mr. Patrick Lacour on that page?  Yes, sir.  And do you see that underneath his signature it says, "Sworn to and subscribed before me this 22 day of October, 2018".  Yes.  Okay. So, you signed that document confirming that Mr. Lacour appeared before you and signed this appraisement sheet; correct?  Yes.  Okay. So, whether you were in or out of the office that day you had, you know, interaction	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A	Object to form.  MR. SHELTON: Okay.  All right. Did from this document, does this refresh your memory of whether or not you would have had interaction with Mr. Lacour on October 22, 2018 in connection with his rendition of his appraisal?  Yes. I did have interaction. Okay. And how does that date, October 22, 2018, square up with the invoice that you have there, Exhibit #27?  Those dates are the same. Okay. And what does the invoice reflect about whether Mr. Lacour actually went to Benton on that date? It just says that he drove from Alex to Benton Okay deliver report and sign appraisement. Where did you work in the sheriff's office civil department; what town?

		165		11	66
1		instance in which you believe you may have ever	1	MR. LANGLEY:	
2		handed over your duties that you performed for	2	Yes.	
3		the sheriff somebody outside the sheriff to do	3		
4		your job for you if there were any?	4		
5	A	I have not.	5		
6	0	Okay. Would you have ever done that?	6		
7	A	No, sir.	7	THE WITNESS WAS EXCUSED.	
8	0	Okay. What was your position about whether you	8	DEPOSITION CONCLUDED AT 5:15 P.M.	
9	~	would faithfully perform your duties to the	9		
10		sheriff in the performance of his official	10		
11		duties?	11		
12	А	Okay. Can you kind of rephrase that?	12		
13	0	Yeah. Did you take an oath as a deputy sheriff?	13		
14	A	Yes, sir.	14		
15	0	Okay. And was that oath to faithfully discharge	15		
	Q	the laws of the State of Louisiana?	16		
16	7				
17	A	Yes, sir.	17		
18	Q	Okay. And did you ever to your recollection	18		
19		fail to do that?	19		
20	A	No, sir.	20		
21	Q	Okay. That's all the questions I have.	21		
22		MR. LANGLEY:	22		
23		We will read and sign.	23		
24		COURT REPORTER:	24		
25		Okay. You want a copy?	25		
1		167	,		68
1		REPORTER'S PAGE	1	CERTIFICATE 1	68
2		REPORTER'S PAGE	2	CERTIFICATE	68
2		REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and	2 3	CERTIFICATE  This certification is valid only for a	68
2 3 4		REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined	2 3 4	CERTIFICATE  This certification is valid only for a transcript accompanied by my original signature and	68
2 3 4 5	in R	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined tule 28 of the Federal Rules of Civil Procedure	2 3 4 5	CERTIFICATE  This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.	68
2 3 4 5 6	in R	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of	2 3 4 5	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and	68
2 3 4 5	in R and/ Civi	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was	2 3 4 5	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before	68
2 3 4 5 6	in R and/ Civi	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of	2 3 4 5	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and	68
2 3 4 5 6 7	in R and/ Civi take	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was	2 3 4 5 6 7	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before	68
2 3 4 5 6 7 8	in R and/ Civi take the	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was an, do hereby state on the Record: That due to	2 3 4 5 6 7 8	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify	68
2 3 4 5 6 7 8	in R and/ Civi take the disc	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined rule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was run, do hereby state on the Record: That due to spontaneous nature of the interaction and	2 3 4 5 6 7 8	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that KIMBERLY FLOURNOY, after having been duly sworn	68
2 3 4 5 6 7 8 9	in R and/Civi take the disc	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined cule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was an, do hereby state on the Record: That due to spontaneous nature of the interaction and course of the proceeding, double-dashes () have	2 3 4 5 6 7 8 9	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that KIMBERLY FLOURNOY, after having been duly sworn by me upon authority of R.S. 37:2554, did testify on	68
2 3 4 5 6 7 8 9 10	in R and/ Civi take the disc been and/	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined cule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of all Procedure, before whom this proceeding was and, do hereby state on the Record: That due to spontaneous nature of the interaction and course of the proceeding, double-dashes () have a used to indicate pauses, changes of thought	2 3 4 5 6 7 8 9 10	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that KIMBERLY FLOURNOY, after having been duly sworn by me upon authority of R.S. 37:2554, did testify on the 26th day of October, 2022, at Shreveport,	68
2 3 4 5 6 7 8 9 10 11	in R and/ Civi take the disc been and/	REPORTER'S PAGE  I, Jeanne Bain, Certified Court Reporter in and the State of Louisiana, the officer, as defined cule 28 of the Federal Rules of Civil Procedure or the Article 1434(B) of the Louisiana Code of 1 Procedure, before whom this proceeding was in, do hereby state on the Record: That due to spontaneous nature of the interaction and course of the proceeding, double-dashes () have used to indicate pauses, changes of thought or talkovers; that such is the universally	2 3 4 5 6 7 8 9 10 11	This certification is valid only for a transcript accompanied by my original signature and original required seal on this certificate.  I, Jeanne Bain, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that KIMBERLY FLOURNOY, after having been duly sworn by me upon authority of R.S. 37:2554, did testify on the 26th day of October, 2022, at Shreveport, Louisiana, as hereinbefore set forth in the	68
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1	and rules of the board; that I have no actual	169
2	knowledge of any prohibited employment or	
3	contractual relationship, direct or indirect,	
4	between a court reporting firm and any party	
5	litigant in this matter, nor is there any such	
6	relationship between myself and a party litigant in	
7	this matter; that I am not related to counsel or to	
8	any of the parties hereto, I am in no manner	
9	associated with counsel for any of the interested	
10	parties to this litigation, and I am in no way	
11	concerned with the outcome thereof.	
12	This 30th day of November, 2022, Shreveport,	
13	Louisiana.	
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25	Certified Court Reporter	
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